

SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT - CONDITIONS	SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT - FUGITIVE DUST CONTROL MEASURES
<p>1. STANDARD DUST MITIGATIONS ARE RECOMMENDED FOR ALL CONSTRUCTION AND/OR GRADING ACTIVITIES. SEE COMMENTS UNDER "FUGITIVE DUST CONTROL MEASURES" ON THIS SHEET.</p> <p>2. THE STATE OF CALIFORNIA CONSIDERS PARTICULATE MATTER EMITTED BY DIESEL ENGINES CARCINOGENIC. THEREFORE, DURING PROJECT GRADING, CONSTRUCTION AND HAULING, CONSTRUCTION CONTRACTS MUST SPECIFY THAT CONTRACTORS SHALL ADHERE TO THE REQUIREMENTS LISTED UNDER "DIESEL PARTICULATE AND NOx EMISSION MEASURES" ON THIS SHEET TO REDUCE EMISSIONS OF PARTICULATE MATTER FROM DIESEL EQUIPMENT AS WELL AS OF OZONE PRECURSORS.</p> <p>3. ALL PORTABLE DIESEL-FIRED CONSTRUCTION ENGINES RATED AT 50 BHP OR GREATER MUST HAVE EITHER STATEWIDE PORTABLE EQUIPMENT REGISTRATION PROGRAM (PERP) CERTIFICATES OR PERP CERTIFICATES ARE EXEMPT FROM APCD PERMIT. PROVIDED, THEY WILL BE ON-SITE FOR LESS THAN 12 MONTHS.</p> <p>4. ADVISORY: THE APPLICANT SHOULD DETERMINE WHETHER ANY STRUCTURE(S) PROPOSED FOR DEMOLITION OR RENOVATION CONTAINS ASBESTOS THAT IS FRAGILE OR HAS THE POTENTIAL TO BECOME FRAGILE DURING DEMOLITION OR DISPOSAL. IF ANY STRUCTURE DOES CONTAIN FRAGILE ASBESTOS, THE ASBESTOS MUST BE REMOVED BY A CONTRACTOR THAT IS STATE CERTIFIED FOR ASBESTOS REMOVAL. FOR ADDITIONAL INFORMATION REGARDING ASBESTOS IN CONSTRUCTION, PLEASE REFER TO APCD'S WEBSITE AT WWW.COURAIR.ORG/ASBESTOS/.</p> <p>5. NATURAL GAS-FIRED FAN-TYPE CENTRAL FURNACES WITH A RATED HEAT INPUT CAPACITY OF LESS THAN 75K BTU/Hr AND WATER HEATERS RATED BELOW 75K BTU/Hr MUST COMPLY WITH THE WWW.DWRBAP.ORG/WEPCONTENT/UPLOADS/RULES92.PDF FOR MORE INFORMATION.</p> <p>6. SMALL BOILERS AND WATER HEATING UNITS (RATED BETWEEN 75K AND 2.0M BTU/Hr) MUST COMPLY WITH THE WWW.DWRBAP.ORG/WEPCONTENT/UPLOADS/RULES92.PDF AND THE COMBINATIONS OF UNITS TOTALING 2.0M BTU/Hr OR GREATER ARE REQUIRED TO OBTAIN AN APCD DISTRICT PERMIT PRIOR TO BUILDING PERMIT ISSUANCE. PLEASE SEE WWW.COURAIR.ORG/WEPCONTENT/UPLOADS/RULES90.PDF FOR MORE INFORMATION AND A LIST OF CERTIFIED BOILERS (NOTE: ANY UNITS FIRED ON FUELS OTHER THAN NATURAL GAS MUST BE CERTIFIED BY THE CALIFORNIA CD ON A CASE-BY-CASE BASIS, EVEN IF THE UNIT IS CERTIFIED WHEN FIRED ON NATURAL GAS).</p> <p>7. ASPHALT PAVING ACTIVITIES SHALL COMPLY WITH APCD RULE 329, <i>CUTBACK AND EMULSIFIED ASPHALT PAVING MATERIALS</i>.</p>	<p>1. DURING CONSTRUCTION, USE WATER TRUCKS OR SPRINKLER SYSTEMS TO KEEP ALL AREAS OF VEHICLE MOVEMENT DAMP ENOUGH TO PREVENT DUST FROM LEAVING THE SITE. AT A MINIMUM, THIS SHOULD INCLUDE WETTING DOWN SUCH AREAS IN THE LATE MORNING AND AFTERNOON. WATER TRUCKS SHOULD BE USED TO WET AREAS OF THE SITE WHERE WIND-DRIVEN DUST MAY BE A PROBLEM. WIND-DRIVEN DUST SHOULD NOT BE USED IN OR AROUND CROPS FOR HUMAN CONSUMPTION.</p> <p>2. MINIMIZE AMOUNT OF DISTURBED AREA AND REDUCE ON SITE VEHICLE SPEEDS TO 15 MPH OR LESS.</p> <p>3. IF IMPORTATION, EXPORTATION AND STOCKPILING OF FILL MATERIAL IS INVOLVED, SOIL STOCKPILED FOR MORE THAN TWO DAYS SHALL BE COVERED, KEPT ROIST, OR TREATED WITH SOIL BINDERS TO PREVENT DUST GENERATION. TRUCKS TRANSPORTING FILL MATERIAL TO AND FROM THE SITE SHALL BE TARPED FROM THE POINT OF ORIGIN.</p> <p>4. GRAVEL PADS SHALL BE INSTALLED AT ALL ACCESS POINTS TO PREVENT TRACKING OF MUD ONTO PUBLIC ROADS.</p> <p>5. AFTER CLEARING, GRADING, EARTH MOVING OR EXCAVATION IS COMPLETED, TREAT THE DISTURBED AREA BY WATERING, OR REVEGETATING, OR BY SPREADING SOIL BINDERS UNTIL THE AREA IS PAVED OR OTHERWISE DEVELOPED SO THAT DUST GENERATION WILL NOT OCCUR.</p> <p>6. THE CONTRACTOR OR BUILDER SHALL DESIGNATE A PERSON OR PERSONS TO MONITOR THE DUST CONTROL PROGRAM AND TO ORDER INCREASED WATERING, AS NECESSARY, TO PREVENT TRANSPORT OF DUST OFFSITE. THEIR DUTIES SHALL INCLUDE HOLIDAY AND WEEKEND PERIODS WHEN WORK MAY NOT BE IN PROGRESS. THE NAME AND TELEPHONE NUMBER OF SUCH PERSONS SHALL BE PROVIDED TO THE AIR POLLUTION CONTROL DISTRICT FOR RECORD. THE CONTRACTOR SHALL MAINTAIN CLEARANCE MAP RECORDATION AND LAND USE CLEARANCE FOR FINISH GRADING OF THE STRUCTURE.</p> <p>7. ALL REQUIREMENTS SHALL BE SHOWN ON GRADING AND BUILDING PLANS AND AS A NOTE ON A GRADING AND BUILDING PLAN. THE CONTRACTOR SHALL MAINTAIN RECORDS OF ALL SUCH REQUIREMENTS AND SHALL BE REQUIRED TO OR MAPS PRIOR TO LAND USE CLEARANCE OR MAP RECORDATION. CONDUCTION SHALL BE ADHERED TO THROUGHOUT ALL GRADING AND CONSTRUCTION PERIODS.</p>

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<p>THE FOLLOWING MEASURES ARE REQUIRED BY STATE LAW:</p> <p>1. ALL PORTABLE DIESEL-POWERED CONSTRUCTION EQUIPMENT SHALL BE REGISTERED WITH THE STATE'S PORTABLE EQUIPMENT REGISTRATION PROGRAM OR SHALL OBTAIN AN APCD PERMIT.</p> <p>2. FLEET OWNERS OF MOBILE CONSTRUCTION EQUIPMENT ARE SUBJECT TO THE CALIFORNIA AIR RESOURCE BOARD (CARB) REGULATION FOR IN-USE OFF-ROAD DIESEL VEHICLES (TITLE 13 CALIFORNIA CODE OF REGULATIONS, CHAPTER 9, 2449). THE PURPOSE OF WHICH IS TO REDUCE EMISSIONS OF PARTICULATE MATTER AND NOx FROM DIESEL-FUELED VEHICLES. FOR MORE INFORMATION, PLEASE REFER TO THE CARB WEBSITE AT WWW.ARB.CA.GOV/MSFROSGO/DIESELORDEIESEL.HTM</p> <p>3. ALL COMMERCIAL DIESEL VEHICLES ARE SUBJECT TO TITLE 13, 2449 OF THE CALIFORNIA CODE OF REGULATIONS, WHICH SPECIFICALLY SETS THE RULES OF HEAVY-DUTY DIESEL CONSTRUCTION EQUIPMENT AND TRUCKS DURING LOADING AND UNLOADING SHALL BE LIMITED TO FIVE MINUTES; ELECTRIC AUXILIARY POWER UNITS SHOULD BE USED WHENEVER POSSIBLE.</p> <p>THE FOLLOWING MEASURES ARE RECOMMENDED:</p> <p>4. DIESEL CONSTRUCTION EQUIPMENT MEETING THE CALIFORNIA AIR RESOURCES BOARD (CARB) REQUIREMENTS SHALL BE USED. EQUIPMENT NOT MEETING CARB REQUIREMENTS SHALL BE LIMITED TO A MAXIMUM EXTENT FEASIBLE.</p> <p>5. DIESEL POWERED EQUIPMENT SHOULD BE REPLACED BY ELECTRIC EQUIPMENT WHENEVER FEASIBLE.</p> <p>6. IF FEASIBLE, DIESEL CONSTRUCTION EQUIPMENT SHALL BE EQUIPPED WITH SELECTIVE CATALYTIC REDUCTION SYSTEMS, DIESEL OXIDATION CATALYSTS AND DIESEL PARTICULATE FILTERS AS CERTIFIED AND/OR VERIFIED BY EPA OR CALIFORNIA.</p> <p>7. CATALYTIC CONVERTERS SHALL BE INSTALLED ON GASOLINE-POWERED EQUIPMENT, IF FEASIBLE.</p> <p>8. ALL CONSTRUCTION EQUIPMENT SHALL BE MAINTAINED IN TUNE PER THE MANUFACTURERS SPECIFICATIONS.</p> <p>9. THE ENGINE SIZE OF CONSTRUCTION EQUIPMENT SHALL BE THE MINIMUM PRACTICAL SIZE.</p> <p>10. THE NUMBER OF CONSTRUCTION EQUIPMENT OPERATING SIMULTANEOUSLY SHALL BE MINIMIZED THROUGH EFFICIENT MANAGEMENT PRACTICES TO ENSURE THAT THE SMALLEST PRACTICAL NUMBER IS OPERATING AT ANY ONE TIME.</p> <p>11. CONSTRUCTION WORKER TRIPS SHOULD BE MINIMIZED BY REQUIRING CARPOOLING AND BY PROVIDING FOR LUNCH ON-SITE.</p> <p>NOTE: MEASURES SHALL BE SHOWN ON GRADING AND BUILDING PLANS AND SHALL BE ADHERED TO THROUGHOUT GRADING, HAULING AND CONSTRUCTION ACTIVITIES.</p>	<p>1. DURING CONSTRUCTION, USE WATER TRUCKS OR SPRINKLER SYSTEMS TO KEEP ALL AREAS OF VEHICLE MOVEMENT DAMP ENOUGH TO PREVENT DUST FROM LEAVING THE SITE. AT A MINIMUM, THIS SHOULD INCLUDE WETTING DOWN SUCH AREAS IN THE LATE MORNING AND AFTERNOON. WATER TRUCKS SHOULD BE USED TO WET AREAS OF THE SITE WHERE WIND-DRIVEN DUST MAY BE A PROBLEM. WIND-DRIVEN DUST SHOULD NOT BE USED IN OR AROUND CROPS FOR HUMAN CONSUMPTION.</p> <p>2. MINIMIZE AMOUNT OF DISTURBED AREA AND REDUCE ON SITE VEHICLE SPEEDS TO 15 MPH OR LESS.</p> <p>3. IF IMPORTATION, EXPORTATION AND STOCKPILING OF FILL MATERIAL IS INVOLVED, SOIL STOCKPILED FOR MORE THAN TWO DAYS SHALL BE COVERED, KEPT ROIST, OR TREATED WITH SOIL BINDERS TO PREVENT DUST GENERATION. TRUCKS TRANSPORTING FILL MATERIAL TO AND FROM THE SITE SHALL BE TARPED FROM THE POINT OF ORIGIN.</p> <p>4. GRAVEL PADS SHALL BE INSTALLED AT ALL ACCESS POINTS TO PREVENT TRACKING OF MUD ONTO PUBLIC ROADS.</p> <p>5. AFTER CLEARING, GRADING, EARTH MOVING OR EXCAVATION IS COMPLETED, TREAT THE DISTURBED AREA BY WATERING, OR REVEGETATING, OR BY SPREADING SOIL BINDERS UNTIL THE AREA IS PAVED OR OTHERWISE DEVELOPED SO THAT DUST GENERATION WILL NOT OCCUR.</p> <p>6. THE CONTRACTOR OR BUILDER SHALL DESIGNATE A PERSON OR PERSONS TO MONITOR THE DUST CONTROL PROGRAM AND TO ORDER INCREASED WATERING, AS NECESSARY, TO PREVENT TRANSPORT OF DUST OFFSITE. THEIR DUTIES SHALL INCLUDE HOLIDAY AND WEEKEND PERIODS WHEN WORK MAY NOT BE IN PROGRESS. THE NAME AND TELEPHONE NUMBER OF SUCH PERSONS SHALL BE PROVIDED TO THE AIR POLLUTION CONTROL DISTRICT FOR RECORD. THE CONTRACTOR SHALL MAINTAIN CLEARANCE MAP RECORDATION AND LAND USE CLEARANCE FOR FINISH GRADING OF THE STRUCTURE.</p> <p>7. ALL REQUIREMENTS SHALL BE SHOWN ON GRADING AND BUILDING PLANS AND AS A NOTE ON A GRADING AND BUILDING PLAN. THE CONTRACTOR SHALL MAINTAIN RECORDS OF ALL SUCH REQUIREMENTS AND SHALL BE REQUIRED TO OR MAPS PRIOR TO LAND USE CLEARANCE OR MAP RECORDATION. CONDUCTION SHALL BE ADHERED TO THROUGHOUT ALL GRADING AND CONSTRUCTION PERIODS.</p>

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SILT FENCING WITH STRAW HAY BALE CONSTRUCTION DETAIL
<p>5'x7' METAL STAKE TO HOLD SILT FENCE EMBEDDED INTO SOIL MIN. 12" AWAY FROM FENCE LINE. SEE CITY OF SB EROSION/SEDIMENTATION CONTROL PROGRAM, REQUIRED BEST MANAGEMENT PRACTICES #1 ON SHEET A11.02.</p> <p>SHAKE AT ACUTE ANGLE TO DOWNWARD SLOPE</p> <p>SLOPE OF GRADE</p> <p>SHAKE AT ACUTE ANGLE TO DOWNWARD SLOPE</p> <p>SLOPE OF GRADE</p> <p>STRAW WATTLES TWO DEEP WITH ONE ON TOP. CLEAR DEBRIS AS NECESSARY. SEE CITY OF SB EROSION/SEDIMENTATION CONTROL PROGRAM, REQUIRED BEST MANAGEMENT PRACTICES #1 ON SHEET A11.02.</p>

CITY OF SANTA BARBARA EROSION/SEDIMENTATION CONTROL PROGRAM - REQUIRED BEST MANAGEMENT PRACTICES (BMP's)
<p>1. GRAVEL CONSTRUCTION ENTRANCE IS GENERALLY REQUIRED WHERE VEHICLE TRAFFIC IS ANTICIPATED OFF OF EXISTING PAVED OR GRAVELED ROADS. THE RESPONSIBILITY FOR FIELD DESIGN TO MEET SITE CONDITIONS, AND MAINTENANCE OF THE CONSTRUCTION ENTRANCES REMAINS WITH THE CONTRACTOR. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE INSTALLATION OF ANY MUD OR DIRT THAT IS TRACKED ONTO STREETS OR PAVED AREAS, EVEN WITH THE INSTALLATION OF GRAVEL CONSTRUCTION ENTRANCES.</p> <p>2. A FILTER SYSTEM SHALL BE USED ON THE CATCH BASIN LOCATED AT THE NORTH-EASTERLY ARC OF THE PROJECT. THE FILTER SHALL BE MAINTAINED AND REPAIRED AS NECESSARY. THE FILTER METHODS WILL REQUIRE THE APPROVAL OF THE CITY.</p> <p>3. FOR ALL PROJECTS, A SILT FENCE OR STRAW WATTLE DIKE SHALL BE INSTALLED ALONG THE DOWN SLOPE OF THE PROJECT. THE SILT FENCE OR STRAW WATTLE DIKE SHALL BE INSTALLED ALONG THE FILTER STRUCTURES SHALL BE LOCATED SO THAT ANY RUNOFF FROM THE CONSTRUCTION SITE IS FILTERED. SEDIMENT SHALL BE REMOVED WHEN THE DEPTH OF SEDIMENT EXCEEDS ONE HALF OF THE HEIGHT OF THE STRUCTURE. SILT FENCES AND STRAW WATTLES SHALL BE INSTALLED ACCORDING TO THE STANDARD REFERENCES CITED.</p> <p>4. STRAW WATTLES CAN BE USED AS DIKES TO STABILIZE TEMPORARY CHANNEL FLOW LINES OR AS A PERIMETER FILTER BARRIER. STRAW WATTLES MUST BE INSTALLED IN A TRENCH, STAKED AND BACKFILLED IF THEY ARE TO BE EFFECTIVE IN REDUCING FLOW VELOCITY AND FILTERING SEDIMENT. STRAW WATTLES SHOULD BE REPLACED WHEN THEY ARE DAMAGED OR WHEN THE SEDIMENT ACCUMULATION EXCEEDS 18 INCHES. WHEN USED AS A PERIMETER FILTER, ANY ACCUMULATED SEDIMENT BE REMOVED WHEN IT REACHES A HEIGHT OF THE LOWEST WATTLE OR 6 INCHES, WHICHEVER IS LESS.</p> <p>5. SILT FENCES SHOULD BE INSTALLED WHERE SEDIMENT FROM SHEET FLOW OR RILL AND GULLY EROSION WILL ENTER DIRECTLY ONTO ADJACENT PROPERTY. WHEN INSTALLING, IT IS IMPORTANT THE FABRIC MATERIAL BE ANCHORED INTO A TRENCH AND BACKFILLED. MAINTENANCE OF FILTER STRUCTURES SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR. SEDIMENT DEPOSITS SHALL BE NEEDED REPAIRS IMP LIMENTED AFTER ANY STORM EVENT WITH MEASURABLE PRECIPITATION. SEDIMENT DEPOSITS SHALL BE REMOVED WHEN MATERIAL REACHES A DEPTH OF MORE HAN ONE-HALF OF THE FENCE HEIGHT.</p> <p>6. PLASTIC SHEETING SHALL GENERALLY NOT BE USED AS AN EROSION CONTROL MEASURE OVER LARGE AREAS. PLASTIC SHEETING MAY BE USED TO PROTECT SMALL, HIGHLY ERODIBLE AREAS, OR TO PROTECT TEMPORARY STOCKPILES OF MATERIAL. IF PLASTIC SHEETING IS USED, ALL RESULTING CONCENTRATED WATER FLOW FROM THE PLASTIC MUST BE DIRECTED TO A PROPERTY DESIGNED DRAINAGE SYSTEM ABLE TO HANDLE THE RUNOFF WITHOUT CAUSING ADDITIONAL EROSION.</p> <p>7. AS FAR AS IS PRACTICABLE, EXISTING VEGETATION SHALL BE PROTECTED AND LEFT IN PLACE. IN PLACES WHERE EXISTING VEGETATION IS DAMAGED OR REMOVED, THE CONTRACTOR SHALL BE RESPONSIBLE FOR REPLANTING AND THE APPROVED EROSION CONTROL PLANS. THE EXCEPTIONS WHERE EXISTING VEGETATION MATERIALS ARE TO BE REMOVED, OR FIRE FUELS REDUCED IN ACCORDANCE WITH AN APPROVED PLAN, WORK AREAS SHALL BE CAREFULLY LOCATED AND MARKED TO REDUCE UNNECESSARY DAMAGE TO EXISTING VEGETATION.</p> <p>8. HYDRO-SEEDING ALONE WILL NORMALLY NOT BE CONSIDERED SATISFACTORY EROSION PROTECTION FOR DISTURBED SLOPES STEEPER THAN 4H:1V. DISTURBED SLOPES STEEPER THAN 4H:1V SHALL BE PROTECTED USING STRAW AND TACKIFIER. THE INSTALLATION OF EROSION CONTROL MATS SHALL BE INSTALLED TO PROTECT SLOPES STEEPER THAN 4H:1V AND GREATER THAN 20 FEET IN SLOPE LENGTH. INSTALLATION OF STRAW WATTLES STAKED ON CONTOUR SHALL BE REQUIRED FOR ALL SLOPES STEEPER THAN 4H:1V WITH SLOPE LENGTHS GREATER THAN 30 FEET. STRAW WATTLES OR SILT FENCING SHALL BE INSTALLED AT THE TOE OF ALL SLOPES STEEPER THAN 4H:1V, AND ALONG (JUST BELOW) TOP OF BANK ALONG ALL CREEKS.</p> <p>9. DURING ANY CLEARING, EARTH MOVING AND/OR GRADING PHASES OF THE PROJECT, WATER TRUCKS OR SPRINKLER SYSTEMS SHALL BE USED IN SUFFICIENT QUANTITIES TO PREVENT DUST FROM LEAVING THE SITE. IN ADDITION, THE ENTIRE AREA OF DISTURBED SOILS SHALL BE WETTED PRIOR TO THE EARLY MORNING HOURS AND AT THE END OF EACH DAY IN SUCH A MANNER AS TO CREATE A CRUST.</p> <p>10. DURING THE CONSTRUCTION PHASE OF THE PROJECT, WATER TRUCKS AND SPRINKLER SYSTEMS SHALL BE USED TO PREVENT DUST FROM LEAVING THE SITE. IN ADDITION, THE ENTIRE AREA OF DISTURBED SOILS SHALL BE WETTED PRIOR TO THE EARLY MORNING HOURS AND AT THE END OF EACH DAY IN SUCH A MANNER AS TO RAISED FROM LEAVING THE SITE, AS A MINIMUM, THIS WILL INCLUDE THE WETTING DOWN OF SUCH AREAS IN THE LATE MORNING HOURS AND AT THE CLOSE OF EACH DAY'S ACTIVITIES.</p> <p>11. ALL TRUCKS HAULING SOIL MATERIALS TO AND FROM THE SITE SHALL BE COVERED WITH A TARP TO PREVENT DUST FROM BLOWING OFF THE TRUCK.</p> <p>12. ALL ALLEYSWAYS, CIRCULATION ROUTES, HAUL ROUTES, STREETS AND SIDEWALKS SHALL BE KEPT CLEAN AND CLEAR OF DIRT, DUST AND DEBRIS IN A MANNER ACCEPTABLE TO THE CITY OF SANTA BARBARA. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE MAINTENANCE OF THE TRUCKS AND CONTROL OF RUNOFF INTO STORM DRAINS AND WATERCOURSES. AT A MINIMUM, SAID AREAS SHALL BE CLEANED AT THE END OF EACH WORKING DAY OR MORE OFTEN IF DIRECTED BY CITY PERSONNEL. THE FLUSHING OF DIRT OR DEBRIS TO STORM DRAIN OR SANITARY SEWER FACILITIES SHALL NOT BE ALLOWED. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE MAINTENANCE OF THE TRUCKS AND WORK ORDER, WHICH WILL NOT BE RELEASED UNTIL, SUCH TIME AS THE AREA IS CLEANED IN A MANNER ACCEPTABLE TO THE CITY. EARTH MOVING AND GRADING ACTIVITIES SHALL BE LIMITED TO THE HOURS BETWEEN 7:00AM AND 6:00PM OR AS SPECIFIED IN THE APPROVED EROSION CONTROL PLAN OR THE PROJECT CONDITIONS OF APPROVAL.</p> <p>13. AFTER THE COMPLETION OF THE CLEARING, GRADING, OR EXCAVATION PHASE, THE ENTIRE AREA OF DISTURBED SOIL SHALL BE TREATED TO PREVENT WIND PICK UP OF THE SOIL. ANY ONE OF THE FOLLOWING METHODS MAY ACCOMPLISH THIS:</p> <p>A. AREAS TO BE VEGETATED WITH REGIONALLY NATIVE LOW STATURE VEGETATION (WPA 2019) AND PER FIRE DEPARTMENT APPROVAL. LOW STATURE NATIVE PLANTS, WHICH CAN ALSO BE MOVED OR TRIMMED AS NECESSARY TO AVOID (MINIMIZE) FUEL LOAD BUILD-UP.</p> <p>B. THE SPREADING OF SOIL BINDERS</p> <p>C. THE WETTING DOWN OF THE AREA IN SUCH A MANNER AS TO CREATE A CRUST ON THE SURFACE. CRUST CLEANING SHALL BE REQUIRED DURING THE WORKING OF THE AREA, AS NECESSARY, TO MAINTAIN THE CRUST AND PREVENT SOIL BLOWING.</p> <p>14. THE CONTRACTOR OR BUILDER SHALL DESIGNATE A PERSON OR PERSONS TO MONITOR THE STORM WATER POLLUTION PREVENTION AND DUST CONTROL PROGRAMS, AND TO ORDER ADDITIONAL BMP'S TO PREVENT STORM WATER POLLUTANTS FROM ENTERING PUBLIC RIGHT-OF-WAY. THIS PERSON'S DUTY SHALL INCLUDE HOLIDAY AND WEEKEND PERIODS WHEN WORK MAY NOT BE IN PROGRESS. THE NAME AND TELEPHONE NUMBER OF SUCH A PERSON OR PERSONS SHALL BE PROVIDED TO THE AIR POLLUTION CONTROL DISTRICT FOR RECORD. THE CONTRACTOR SHALL MAINTAIN CLEARANCE MAP RECORDATION AND LAND USE CLEARANCE FOR FINISH GRADING OF THE STRUCTURE.</p> <p>15. THE EROSION PREVENTION AND SEDIMENT CONTROL MEASURES SHALL REMAIN IN PLACE AND BE MAINTAINED THROUGHOUT THE CONSTRUCTION PERIOD. DISTURBED SOIL AREAS ARE REQUIRED BY INSTALLATION AND ESTABLISHMENT OF LANDSCAPING, GRASS, MULCHING OR ARE OTHERWISE COVERED AND PROTECTED FROM EROSION.</p>

CALIFORNIA COASTAL COMMISSION STORM WATER MANAGEMENT CRITERIA - CONSTRUCTION BEST MANAGEMENT PRACTICES (BMP's)
<p>1. ALL SITE GRADING TO BE TAKE PLACE BETWEEN ONLY DURING MAY 1 THROUGH OCTOBER 31.</p> <p>2. THE EROSION CONTROL MEASURES SHALL BE REQUIRED ON THE PROJECT SITE PRIOR TO OR CONCURRENT WITH ANY EARTH MOVING OR EXCAVATION. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE DESIGN, INSTALLATION, MAINTENANCE AND REMOVAL OF EROSION CONTROL MEASURES. THE EROSION CONTROL MEASURES SHOULD BE RETAINED ON-SITE, UNLESS REMOVED TO AN APPROPRIATE, APPROVED DUMPING LOCATION EITHER OUTSIDE OF THE COASTAL ZONE OR WITHIN THE COASTAL ZONE TO A SITE PERMITTED TO RECEIVE FILL.</p> <p>3. ALL TEMPORARY, CONSTRUCTION RELATED EROSION CONTROL MATERIALS SHALL BE COMPRISED OF BIO-DEGRADABLE MATERIALS AND MUST BE REMOVED WHEN PERMANENT EROSION CONTROL MEASURES ARE IN PLACE. BIO-DEGRADABLE EROSION CONTROL MEASURES MAY BE LEFT IN PLACE IF THEY HAVE BEEN INCORPORATED INTO THE PERMANENT LANDSCAPING DESIGN.</p> <p>4. NO DEMO OR CONSTRUCTION MATERIALS, DEBRIS, OR WASTE SHALL BE PLACED OR STORED WHERE IT MAY ENTER SENSITIVE HABITAT, RECEIVING WATERS OR A STORM DRAIN, OR BE SUBJECT TO WAVE, RAIN, OR TIDAL EROSION AND DISPERSION.</p> <p>5. NO DEMO OR CONSTRUCTION EQUIPMENT, MATERIALS, OR ACTIVITY SHALL BE PLACED IN OR OCCUR IN ANY LOCATION THAT WOULD RESULT IN IMPACTS TO ENVIRONMENTALLY SENSITIVE HABITAT AREAS, STREAMS, WETLANDS OR THEIR BUFFERS.</p> <p>6. ANY AND ALL DEBRIS RESULTING FROM DEMOLITION OR CONSTRUCTION ACTIVITIES SHALL BE REMOVED FROM THE PROJECT SITE WITHIN 24 HOURS OF COMPLETION OF THE PROJECT.</p> <p>7. DEMO OR CONSTRUCTION DEBRIS AND SEDIMENT SHALL BE REMOVED FROM WORK AREAS EACH DAY THAT DEMO OR CONSTRUCTION OCCURS TO PREVENT THE ACCUMULATION OF SEDIMENT AND OTHER DEBRIS THAT MAY BE DISCHARGED INTO COASTAL WATERS.</p> <p>8. ALL TRASH AND DEBRIS SHALL BE DISPOSED IN THE PROPER TRASH AND RECYCLING RECEPTACLES AT THE END OF EVERY CONSTRUCTION DAY.</p> <p>9. THE CONTRACTOR SHALL PROVIDE ADEQUATE DISPOSAL FACILITIES FOR SOLID WASTE INCLUDING EXCESS CONCRETE PRODUCED DURING DEMO OR CONSTRUCTION.</p> <p>10. DEBRIS SHALL BE DISPOSED OF AT A PERMITTED DISPOSAL SITE OR RECYCLED AT A PERMITTED RECYCLING FACILITY. IF THE DISPOSAL SITE IS LOCATED IN THE COASTAL ZONE, A COP OR AN AMENDMENT TO THIS PERMIT SHALL BE REQUIRED BEFORE DISPOSAL CAN TAKE PLACE UNLESS A DETERMINATION IS MADE THAT NO AMENDMENT OR NEW PERMIT IS LEGALLY REQUIRED.</p> <p>11. ALL STOCK PILES AND CONSTRUCTION MATERIALS SHALL BE COVERED, ENCLOSED ON ALL SIDES, SHALL BE LOCATED AS FAR AWAY AS POSSIBLE FROM DRAIN INLETS AND ANY WATERWAY, AND SHALL NOT BE DISCHARGED INTO SANITARY OR STORM SEWER SYSTEMS.</p> <p>12. MACHINERY AND EQUIPMENT SHALL BE MAINTAINED AND WASHED IN CONFINED AREAS SPECIFICALLY DESIGNED TO CONTROL RUNOFF. THINNERS OR SOLVENTS SHALL NOT BE DISCHARGED INTO SANITARY OR STORM SEWER SYSTEMS.</p> <p>13. THE DISCHARGE OF ANY HAZARDOUS MATERIALS INTO ANY RECEIVING WATERS SHALL BE PROHIBITED.</p> <p>14. SPILL PREVENTION AND CONTROL MEASURES SHALL BE IMPLEMENTED TO ENSURE THE PROPER HANDLING AND STORAGE OF ALL LIQUIDS. ALL LIQUIDS SHALL BE STORED IN A MANNER THAT SHALL INCLUDE A DESIGNATED FUELING AND VEHICLE MAINTENANCE AREA, WITH APPROPRIATE BURNS AND PROTECTION, TO PREVENT ANY SPILLAGE OF GASOLINE OR RELATED PETROLEUM PRODUCTS OR CONTACT WITH RUNOFF. THE AREA SHALL BE LOCATED AS FAR AWAY FROM THE RECEIVING WATERS AND STORM DRAIN INLETS AS POSSIBLE.</p> <p>15. BEST MANAGEMENT PRACTICES (BMP'S) & GOOD HOUSEKEEPING PRACTICES (GHP'S) DESIGNED TO PREVENT SPILLAGE AND/OR RUNOFF OF DEMO OR CONSTRUCTION RELATED MATERIALS, AND TO CONTAIN SEDIMENT OR CONTAMINANTS ASSOCIATED WITH DEMOLITION OR CONSTRUCTION ACTIVITY, SHALL BE IMPLEMENTED PRIOR TO THE ON-SET OF SUCH ACTIVITY.</p> <p>16. ALL BMP'S SHALL BE MAINTAINED IN A FUNCTIONAL CONDITION THROUGHOUT THE DURATION OF CONSTRUCTION ACTIVITY.</p>

CITY OF SANTA BARBARA EROSION/SEDIMENTATION CONTROL PROGRAM - REQUIRED BEST MANAGEMENT PRACTICES (BMP's)	CALIFORNIA COASTAL COMMISSION STORM WATER MANAGEMENT CRITERIA - CONSTRUCTION BEST MANAGEMENT PRACTICES (BMP's)
<p>1. GRAVEL CONSTRUCTION ENTRANCE IS GENERALLY REQUIRED WHERE VEHICLE TRAFFIC IS ANTICIPATED OFF OF EXISTING PAVED OR GRAVELED ROADS. THE RESPONSIBILITY FOR FIELD DESIGN TO MEET SITE CONDITIONS, AND MAINTENANCE OF THE CONSTRUCTION ENTRANCES REMAINS WITH THE CONTRACTOR. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE INSTALLATION OF ANY MUD OR DIRT THAT IS TRACKED ONTO STREETS OR PAVED AREAS, EVEN WITH THE INSTALLATION OF GRAVEL CONSTRUCTION ENTRANCES.</p> <p>2. A FILTER SYSTEM SHALL BE USED ON THE CATCH BASIN LOCATED AT THE NORTH-EASTERLY ARC OF THE PROJECT. THE FILTER SHALL BE MAINTAINED AND REPAIRED AS NECESSARY. THE FILTER METHODS WILL REQUIRE THE APPROVAL OF THE CITY.</p> <p>3. FOR ALL PROJECTS, A SILT FENCE OR STRAW WATTLE DIKE SHALL BE INSTALLED ALONG THE DOWN SLOPE OF THE PROJECT. THE SILT FENCE OR STRAW WATTLE DIKE SHALL BE INSTALLED ALONG THE FILTER STRUCTURES SHALL BE LOCATED SO THAT ANY RUNOFF FROM THE CONSTRUCTION SITE IS FILTERED. SEDIMENT SHALL BE REMOVED WHEN THE DEPTH OF SEDIMENT EXCEEDS ONE HALF OF THE HEIGHT OF THE STRUCTURE. SILT FENCES AND STRAW WATTLES SHALL BE INSTALLED ACCORDING TO THE STANDARD REFERENCES CITED.</p> <p>4. STRAW WATTLES CAN BE USED AS DIKES TO STABILIZE TEMPORARY CHANNEL FLOW LINES OR AS A PERIMETER FILTER BARRIER. STRAW WATTLES MUST BE INSTALLED IN A TRENCH, STAKED AND BACKFILLED IF THEY ARE TO BE EFFECTIVE IN REDUCING FLOW VELOCITY AND FILTERING SEDIMENT. STRAW WATTLES SHOULD BE REPLACED WHEN THEY ARE DAMAGED OR WHEN THE SEDIMENT ACCUMULATION EXCEEDS 18 INCHES. WHEN USED AS A PERIMETER FILTER, ANY ACCUMULATED SEDIMENT BE REMOVED WHEN IT REACHES A HEIGHT OF THE LOWEST WATTLE OR 6 INCHES, WHICHEVER IS LESS.</p> <p>5. SILT FENCES SHOULD BE INSTALLED WHERE SEDIMENT FROM SHEET FLOW OR RILL AND GULLY EROSION WILL ENTER DIRECTLY ONTO ADJACENT PROPERTY. WHEN INSTALLING, IT IS IMPORTANT THE FABRIC MATERIAL BE ANCHORED INTO A TRENCH AND BACKFILLED. MAINTENANCE OF FILTER STRUCTURES SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR. SEDIMENT DEPOSITS SHALL BE NEEDED REPAIRS IMP LIMENTED AFTER ANY STORM EVENT WITH MEASURABLE PRECIPITATION. SEDIMENT DEPOSITS SHALL BE REMOVED WHEN MATERIAL REACHES A DEPTH OF MORE HAN ONE-HALF OF THE FENCE HEIGHT.</p> <p>6. PLASTIC SHEETING SHALL GENERALLY NOT BE USED AS AN EROSION CONTROL MEASURE OVER LARGE AREAS. PLASTIC SHEETING MAY BE USED TO PROTECT SMALL, HIGHLY ERODIBLE AREAS, OR TO PROTECT TEMPORARY STOCKPILES OF MATERIAL. IF PLASTIC SHEETING IS USED, ALL RESULTING CONCENTRATED WATER FLOW FROM THE PLASTIC MUST BE DIRECTED TO A PROPERTY DESIGNED DRAINAGE SYSTEM ABLE TO HANDLE THE RUNOFF WITHOUT CAUSING ADDITIONAL EROSION.</p> <p>7. AS FAR AS IS PRACTICABLE, EXISTING VEGETATION SHALL BE PROTECTED AND LEFT IN PLACE. IN PLACES WHERE EXISTING VEGETATION IS DAMAGED OR REMOVED, THE CONTRACTOR SHALL BE RESPONSIBLE FOR REPLANTING AND THE APPROVED EROSION CONTROL PLANS. THE EXCEPTIONS WHERE EXISTING VEGETATION MATERIALS ARE TO BE REMOVED, OR FIRE FUELS REDUCED IN ACCORDANCE WITH AN APPROVED PLAN, WORK AREAS SHALL BE CAREFULLY LOCATED AND MARKED TO REDUCE UNNECESSARY DAMAGE TO EXISTING VEGETATION.</p> <p>8. HYDRO-SEEDING ALONE WILL NORMALLY NOT BE CONSIDERED SATISFACTORY EROSION PROTECTION FOR DISTURBED SLOPES STEEPER THAN 4H:1V. DISTURBED SLOPES STEEPER THAN 4H:1V SHALL BE PROTECTED USING STRAW AND TACKIFIER. THE INSTALLATION OF EROSION CONTROL MATS SHALL BE INSTALLED TO PROTECT SLOPES STEEPER THAN 4H:1V AND GREATER THAN 20 FEET IN SLOPE LENGTH. INSTALLATION OF STRAW WATTLES STAKED ON CONTOUR SHALL BE REQUIRED FOR ALL SLOPES STEEPER THAN 4H:1V WITH SLOPE LENGTHS GREATER THAN 30 FEET. STRAW WATTLES OR SILT FENCING SHALL BE INSTALLED AT THE TOE OF ALL SLOPES STEEPER THAN 4H:1V, AND ALONG (JUST BELOW) TOP OF BANK ALONG ALL CREEKS.</p> <p>9. DURING ANY CLEARING, EARTH MOVING AND/OR GRADING PHASES OF THE PROJECT, WATER TRUCKS OR SPRINKLER SYSTEMS SHALL BE USED IN SUFFICIENT QUANTITIES TO PREVENT DUST FROM LEAVING THE SITE. IN ADDITION, THE ENTIRE AREA OF DISTURBED SOILS SHALL BE WETTED PRIOR TO THE EARLY MORNING HOURS AND AT THE END OF EACH DAY IN SUCH A MANNER AS TO CREATE A CRUST.</p> <p>10. DURING THE CONSTRUCTION PHASE OF THE PROJECT, WATER TRUCKS AND SPRINKLER SYSTEMS SHALL BE USED TO PREVENT DUST FROM LEAVING THE SITE. IN ADDITION, THE ENTIRE AREA OF DISTURBED SOILS SHALL BE WETTED PRIOR TO THE EARLY MORNING HOURS AND AT THE END OF EACH DAY IN SUCH A MANNER AS TO RAISED FROM LEAVING THE SITE, AS A MINIMUM, THIS WILL INCLUDE THE WETTING DOWN OF SUCH AREAS IN THE LATE MORNING HOURS AND AT THE CLOSE OF EACH DAY'S ACTIVITIES.</p> <p>11. ALL TRUCKS HAULING SOIL MATERIALS TO AND FROM THE SITE SHALL BE COVERED WITH A TARP TO PREVENT DUST FROM BLOWING OFF THE TRUCK.</p> <p>12. ALL ALLEYSWAYS, CIRCULATION ROUTES, HAUL ROUTES, STREETS AND SIDEWALKS SHALL BE KEPT CLEAN AND CLEAR OF DIRT, DUST AND DEBRIS IN A MANNER ACCEPTABLE TO THE CITY OF SANTA BARBARA. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE MAINTENANCE OF THE TRUCKS AND CONTROL OF RUNOFF INTO STORM DRAINS AND WATERCOURSES. AT A MINIMUM, SAID AREAS SHALL BE CLEANED AT THE END OF EACH WORKING DAY OR MORE OFTEN IF DIRECTED BY CITY PERSONNEL. THE FLUSHING OF DIRT OR DEBRIS TO STORM DRAIN OR SANITARY SEWER FACILITIES SHALL NOT BE ALLOWED. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE MAINTENANCE OF THE TRUCKS AND WORK ORDER, WHICH WILL NOT BE RELEASED UNTIL, SUCH TIME AS THE AREA IS CLEANED IN A MANNER ACCEPTABLE TO THE CITY. EARTH MOVING AND GRADING ACTIVITIES SHALL BE LIMITED TO THE HOURS BETWEEN 7:00AM AND 6:00PM OR AS SPECIFIED IN THE APPROVED EROSION CONTROL PLAN OR THE PROJECT CONDITIONS OF APPROVAL.</p> <p>13. AFTER THE COMPLETION OF THE CLEARING, GRADING, OR EXCAVATION PHASE, THE ENTIRE AREA OF DISTURBED SOIL SHALL BE TREATED TO PREVENT WIND PICK UP OF THE SOIL. ANY ONE OF THE FOLLOWING METHODS MAY ACCOMPLISH THIS:</p> <p>A. AREAS TO BE VEGETATED WITH REGIONALLY NATIVE LOW STATURE VEGETATION (WPA 2019) AND PER FIRE DEPARTMENT APPROVAL. LOW STATURE NATIVE PLANTS, WHICH CAN ALSO BE MOVED OR TRIMMED AS NECESSARY TO AVOID (MINIMIZE) FUEL LOAD BUILD-UP.</p> <p>B. THE SPREADING OF SOIL BINDERS</p> <p>C. THE WETTING DOWN OF THE AREA IN SUCH A MANNER AS TO CREATE A CRUST ON THE SURFACE. CRUST CLEANING SHALL BE REQUIRED DURING THE WORKING OF THE AREA, AS NECESSARY, TO MAINTAIN THE CRUST AND PREVENT SOIL BLOWING.</p> <p>14. THE CONTRACTOR OR BUILDER SHALL DESIGNATE A PERSON OR PERSONS TO MONITOR THE STORM WATER POLLUTION PREVENTION AND DUST CONTROL PROGRAMS, AND TO ORDER ADDITIONAL BMP'S TO PREVENT STORM WATER POLLUTANTS FROM ENTERING PUBLIC RIGHT-OF-WAY. THIS PERSON'S DUTY SHALL INCLUDE HOLIDAY AND WEEKEND PERIODS WHEN WORK MAY NOT BE IN PROGRESS. THE NAME AND TELEPHONE NUMBER OF SUCH A PERSON OR PERSONS SHALL BE PROVIDED TO THE AIR POLLUTION CONTROL DISTRICT FOR RECORD. THE CONTRACTOR SHALL MAINTAIN CLEARANCE MAP RECORDATION AND LAND USE CLEARANCE FOR FINISH GRADING OF THE STRUCTURE.</p> <p>15. THE EROSION PREVENTION AND SEDIMENT CONTROL MEASURES SHALL REMAIN IN PLACE AND BE MAINTAINED THROUGHOUT THE CONSTRUCTION PERIOD. DISTURBED SOIL AREAS ARE REQUIRED BY INSTALLATION AND ESTABLISHMENT OF LANDSCAPING, GRASS, MULCHING OR ARE OTHERWISE COVERED AND PROTECTED FROM EROSION.</p>	<p>1. ALL SITE GRADING TO BE TAKE PLACE BETWEEN ONLY DURING MAY 1 THROUGH OCTOBER 31.</p> <p>2. THE EROSION CONTROL MEASURES SHALL BE REQUIRED ON THE PROJECT SITE PRIOR TO OR CONCURRENT WITH ANY EARTH MOVING OR EXCAVATION. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE DESIGN, INSTALLATION, MAINTENANCE AND REMOVAL OF EROSION CONTROL MEASURES. THE EROSION CONTROL MEASURES SHOULD BE RETAINED ON-SITE, UNLESS REMOVED TO AN APPROPRIATE, APPROVED DUMPING LOCATION EITHER OUTSIDE OF THE COASTAL ZONE OR WITHIN THE COASTAL ZONE TO A SITE PERMITTED TO RECEIVE FILL.</p> <p>3. ALL TEMPORARY, CONSTRUCTION RELATED EROSION CONTROL MATERIALS SHALL BE COMPRISED OF BIO-DEGRADABLE MATERIALS AND MUST BE REMOVED WHEN PERMANENT EROSION CONTROL MEASURES ARE IN PLACE. BIO-DEGRADABLE EROSION CONTROL MEASURES MAY BE LEFT IN PLACE IF THEY HAVE BEEN INCORPORATED INTO THE PERMANENT LANDSCAPING DESIGN.</p> <p>4. NO DEMO OR CONSTRUCTION MATERIALS, DEBRIS, OR WASTE SHALL BE PLACED OR STORED WHERE IT MAY ENTER SENSITIVE HABITAT, RECEIVING WATERS OR A STORM DRAIN, OR BE SUBJECT TO WAVE, RAIN, OR TIDAL EROSION AND DISPERSION.</p> <p>5. NO DEMO OR CONSTRUCTION EQUIPMENT, MATERIALS, OR ACTIVITY SHALL BE PLACED IN OR OCCUR IN ANY LOCATION THAT WOULD RESULT IN IMPACTS TO ENVIRONMENTALLY SENSITIVE HABITAT AREAS, STREAMS, WETLANDS OR THEIR BUFFERS.</p> <p>6. 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IF THE DISPOSAL SITE IS LOCATED IN THE COASTAL ZONE, A COP OR AN AMENDMENT TO THIS PERMIT SHALL BE REQUIRED BEFORE DISPOSAL CAN TAKE PLACE UNLESS A DETERMINATION IS MADE THAT NO AMENDMENT OR NEW PERMIT IS LEGALLY REQUIRED.</p> <p>11. ALL STOCK PILES AND CONSTRUCTION MATERIALS SHALL BE COVERED, ENCLOSED ON ALL SIDES, SHALL BE LOCATED AS FAR AWAY AS POSSIBLE FROM DRAIN INLETS AND ANY WATERWAY, AND SHALL NOT BE DISCHARGED INTO SANITARY OR STORM SEWER SYSTEMS.</p> <p>12. MACHINERY AND EQUIPMENT SHALL BE MAINTAINED AND WASHED IN CONFINED AREAS SPECIFICALLY DESIGNED TO CONTROL RUNOFF. THINNERS OR SOLVENTS SHALL NOT BE DISCHARGED INTO SANITARY OR STORM SEWER SYSTEMS.</p> <p>13. THE DISCHARGE OF ANY HAZARDOUS MATERIALS INTO ANY RECEIVING WATERS SHALL BE PROHIBITED.</p> <p>14. SPILL PREVENTION AND CONTROL MEASURES SHALL BE IMPLEMENTED TO ENSURE THE PROPER HANDLING AND STORAGE OF ALL LIQUIDS. ALL LIQUIDS SHALL BE STORED IN A MANNER THAT SHALL INCLUDE A DESIGNATED FUELING AND VEHICLE MAINTENANCE AREA, WITH APPROPRIATE BURNS AND PROTECTION, TO PREVENT ANY SPILLAGE OF GASOLINE OR RELATED PETROLEUM PRODUCTS OR CONTACT WITH RUNOFF. THE AREA SHALL BE LOCATED AS FAR AWAY FROM THE RECEIVING WATERS AND STORM DRAIN INLETS AS POSSIBLE.</p> <p>15. BEST MANAGEMENT PRACTICES (BMP'S) & GOOD HOUSEKEEPING PRACTICES (GHP'S) DESIGNED TO PREVENT SPILLAGE AND/OR RUNOFF OF DEMO OR CONSTRUCTION RELATED MATERIALS, AND TO CONTAIN SEDIMENT OR CONTAMINANTS ASSOCIATED WITH DEMOLITION OR CONSTRUCTION ACTIVITY, SHALL BE IMPLEMENTED PRIOR TO THE ON-SET OF SUCH ACTIVITY.</p> <p>16. ALL BMP'S SHALL BE MAINTAINED IN A FUNCTIONAL CONDITION THROUGHOUT THE DURATION OF CONSTRUCTION ACTIVITY.</p>

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AREA TO BE VEGETATED WITH REGIONALLY NATIVE LOW STATURE VEGETATION (MRA, 2015) AND PER FIRE DEPARTMENT APPROVAL, SEE TABLE 1, RECOMMENDED

[illegible][illegible]

PROPOSED OTD OPEN SPACE EASEMENT

COBBLE DRAIN LINE (CDL) SERVES EAST SIDE YARD, LOWER PRIVATE

AREA TO BE VEGETATED WITH REGIONALLY NATIVE LOW STATURE VEGETATION (WRA 2015) AND PER FIRE DEPARTMENT APPROVAL SEE TABLE 1. RECOMMENDED VEGETATION SPECIES FOR LIST (WRA 2015) THAT INCLUDES LOW STATURE NATIVE PLANTS, WHICH CAN ALSO BE

COBBLE DRAIN LINE (CDL) SERVES EAST SIDE YARD, LOWER PRIVATE

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RECORD OF SLOPE REPAIRS

MEAN HIGH WATER (MHW) (100-YEAR FLOOD)

COBBLE DRAIN LINE (CDL) SERVES TO DISCHARGE EXCESS STORM WATER FROM WEST-1 CONNECTED BY ASTERS WILL BE REVEGETATED WITH REGIONALLY NATIVE LOW STATURE OPEN SPACE, AND HORTICULTURAL LEMONADE BERRY MITIGATION AREA.

BUILT-UP SLOPE BETWEEN THE LOWER SHEAR PIN ROW / PATIO RW AND THE 100-FOOT BUFFER FROM COASTAL BLUFF SCRUB AND CLIFF

RESTORED SLOPE BETWEEN THE LOWER SHEAR PIN ROW / PATIO RW AND THE 100-FOOT BUFFER FROM COASTAL BLUFF SCRUB AND CLIFF

MOWED OR TRIMMED AS NECESSARY TO AVOID (MINIMIZE) FUEL LOAD BUILD-UP

2

A004

THIS PROJECT

INGROUND PIPE FROM WS1-1 TO HEAD OF CUL. VEGETATION (WRA, 2015). RECOMMENDED VEGETATION SPECIES CAN BE FOUND UNDER TABLE 1 ON THIS SHEET.

Category	18-24	25-34	35-44	45-54	55-64	65+
TLSE	~10%	~20%	~30%	~40%	~50%	~60%
TRUN	~10%	~20%	~30%	~40%	~50%	~60%
TLSE	~10%	~20%	~30%	~40%	~50%	~60%

UNDARY
R (MTLS)
UNDARY

SITE PLAN SYMBOLS	TABLE 1 - RECOMMENDED VEGETATION SPECIES
	GRASSES AND HERBS

BEACH - 0.05 ACRE
(OTD PUBLIC LATERAL BEACH ACCESS)

CONTIGUOUS LEMONADE BERRY STAND
0.15 ACRE (OTD OPEN SPACE EASEMENT)

ACHILLEA MILLEFOLIUM - YARROW

FRAGARIA CALIFORNICA - CALIFORNIA STRAWBERRY

LALU

 SOUTHERN COASTAL BLUFF SCRUB - 0.04
 ACRE (OTD OPEN SPACE EASEMENT WITH
 RESERVES) PRIVATE EASEMENT IN FAVOR
 OF 1827 ECDLL

ESCHSCHOLZIA CALIFORNICA - CALIFORNIA POPPY

(N) HORTICULTURAL LEMONADE BERRY MITIGATION AREA - 0.01 ACRE, INCLUDES RESTORATION OF THE CITY (1978) TOE OF GRADING AREA

DIAGONAL CROSSHATCHED AREA

MELICA IMPERFECTA - CHAPARRAL MELICA

1915 ECOLL

AMINAM

REPRESENTS TEMPORARY JUTE NETTING WITH PINS, TO FACILITATE RECOLONIZING RESTORATION OF THE NORTHWESTERLY UPPER COASTAL BLUFF

FACE WITH IN-SITU NATIVE VEGETATION



EUTHAMIA OCCIDENTALIS -
WESTERN GOLDENROD

NOTE: ALL REGIONAL NATIVE VEGETATION PLANTS WILL
BE IN 1.5 GALLON CONTAINERS, AS AVAILABLE FROM
LOCAL REGIONAL NATIVE PLANT NURSERIES. WITH THE
RESPECTIVE NUMBER OF PLANTS TO BE DETERMINED.

















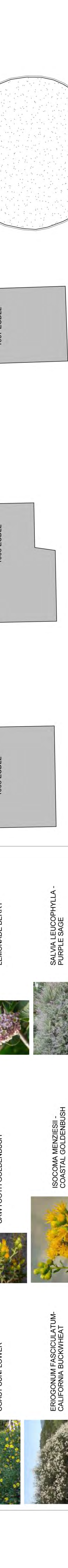
TABLE 1 - RECOMMENDED VEGETATION SPECIES	
	AND PROVIDED AS PART OF THE FINAL LANDSCAPE ARCHITECT'S PLANTING PLAN AT THE TIME OF FINAL APPROVAL.


SHRUBS			
			

	<p>MIMULUS AURANTIACUS - STICKY MONKEY FLOWER</p>
	<p>ERIOPHYLLUM CONFERTIFLORUM - GOLDEN YARROW</p>
	<p>ARTEMISIA CALIFORNICA - CALIFORNIA SAGE</p>

[illegible]

 <p>EUCALYPTUS INTEGRIFOLIA - 100% EUCALI</p>	 <p>EUCALYPTUS INTEGRIFOLIA - 100% EUCALI</p>
 <p>EUCALYPTUS INTEGRIFOLIA - 100% EUCALI</p>	 <p>EUCALYPTUS INTEGRIFOLIA - 100% EUCALI</p>
 <p>EUCALYPTUS INTEGRIFOLIA - 100% EUCALI</p>	 <p>EUCALYPTUS INTEGRIFOLIA - 100% EUCALI</p>

 <p>ERIOGONUM FASCICULATUM - CALIFORNIA BUCKWHEAT</p>	 <p>ISOCOMA MENZIESII - COASTAL GOLDENBUSH</p>	 <p>SALVIA LEUCOPHYLLA - PURPLE SAGE</p>	 <p>LEIONARDUS BERNI</p>	
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CONCEPT LANDSCAPE PLAN

1" = 20'-0"

0' 20' 50' 100'

N

PH | 805.963.2100
FX | 805.963.2300
420 E HALEY STREET
SANTA BARBARA | CALIFORNIA 93101
www.abdesignstudioinc.com

project team

COASTAL PROGRAM CONSULTANT

Norbert Dall, Stephanie Dall
Dall & Associates
930 Florin Road, Suite 200
Sacramento, CA 95831
ph: 916.392.0283

Geotechnical Engineer, Engineering Geologist
sdall49@aol.com
e: norbertdall@icloud.com

Pat Shires, John Wallace
Cotton, Shires & Assoc., Inc.
2804 Camino Dos Rios, Ste. 201
Thousand Oaks, CA 91320
ph: 805.375.1050
e: cottonshires@me.com
e: jwallace@cottonshires.com

CHARLIE GRANT, ASCE
 CIVIL ENGINEER
 ph: 330.685.3525
 e: clgrant@sssn.net

BIOLOGIST
Geoff Smick
WRA, Inc.
2169-G East Francisco Blvd.
San Rafael, CA 94901
ph: 415.454.8868
e: smick@wra-ca.com

David Skelly, MS, PE
Geo Soils, Inc.
5741 Palmer Way
Carlsbad, CA 92010
ph: 760.438.3155
e: dskelly@geosoilsinc.com

HISTORIC COASTAL BLUFF POSITION
Joseph Scepán
GeoSciences
3061 Ruby Drive
Medford, OR 97504
ph: 541.690.7595
e: jscepán@charter.net

Paul Cook
L.P. Cook & Company
1029 State Street
Santa Barbara, CA 93101
ph: 805.966.5105
e: pcook@lpcook.com

Printed / revised

3-02-2016
SFDB CONCEPT #2 HEARING
07-07-2016
PLANNING COMMISSION HEARING

1925 E.C.D.L.L.
RESIDENTIAL REUSE PROJECT

PROJECT #1147

PROJECT ADDRESS

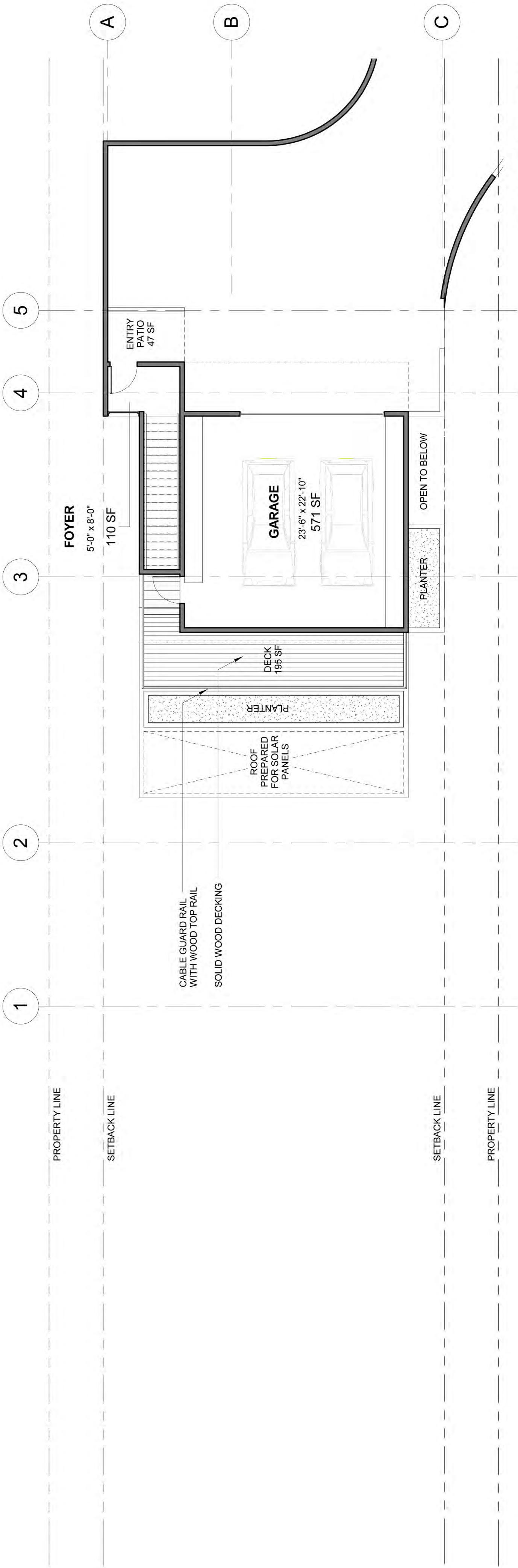
1925 EL CAMINO DE LA LUZ
SANTA BARBARA, CA 93109

OWNER CONTACT

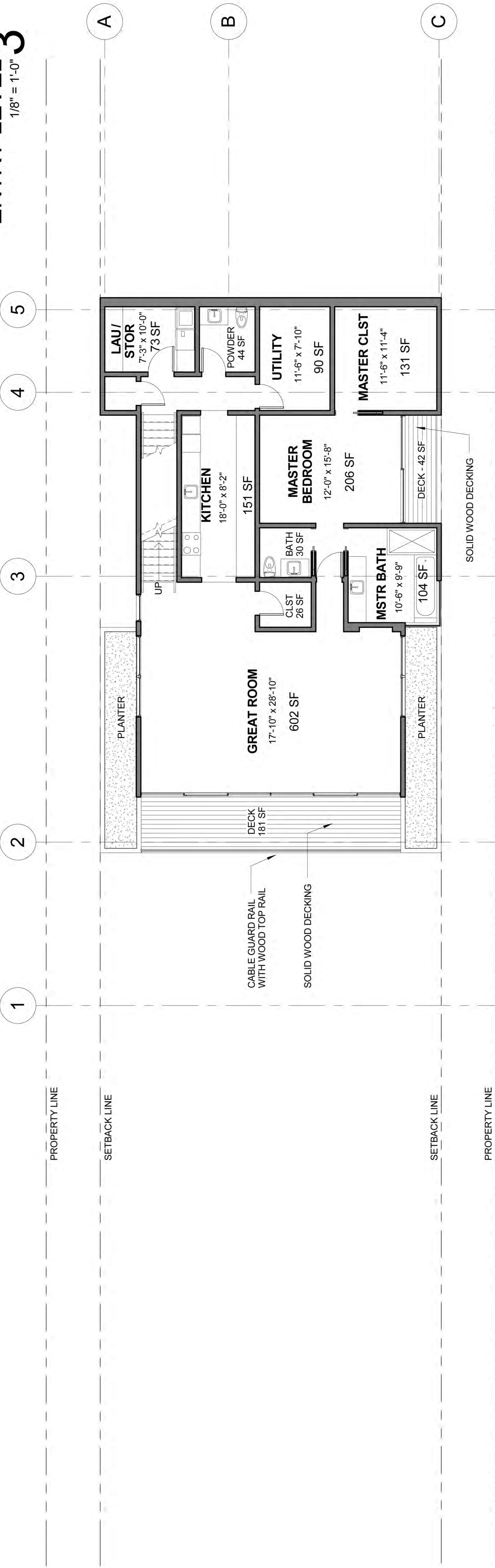
EMPIRE TRUST
805.637.9009

A2.01

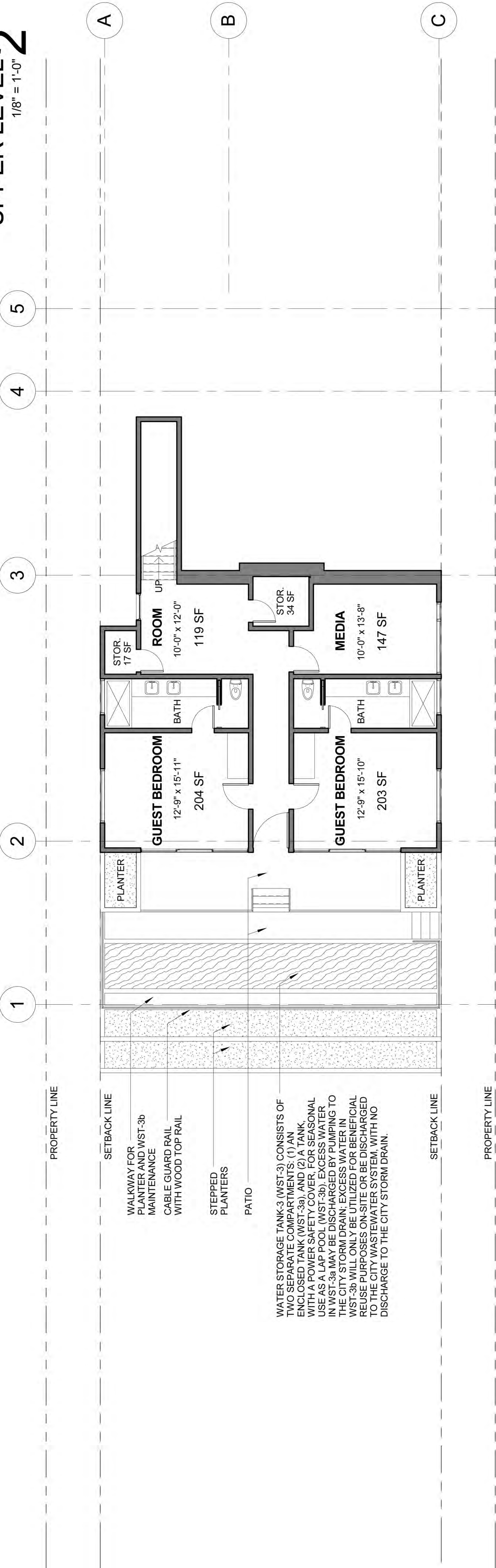
CONCEPT FLOOR PLANS



ENTRY LEVEL 3
1/8" = 1'-0"



UPPER LEVEL 2
1/8" = 1'-0"



LOWER LEVEL 1
1/8" = 1'-0"

key notes

1

PLASTER

2

WOOD SIDING

3

CABLE GUARD RAIL

4

ANODIZED ALUMINUM DOOR & WINDOW SYSTEM

5

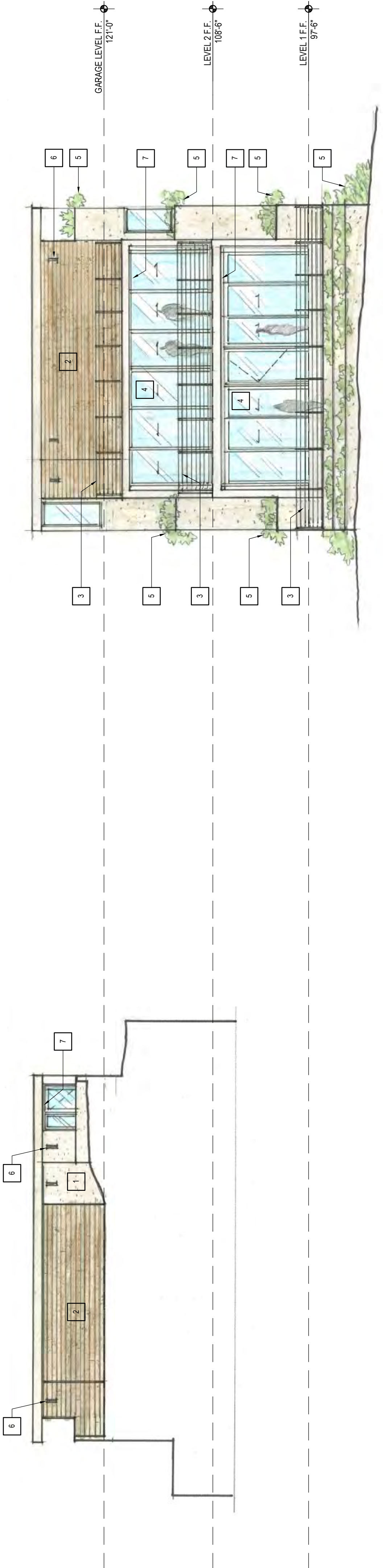
(N) NATIVE VEGETATION

6

EXTERIOR DOWN-CASTING WALL SCONCE

7

EXTERIOR DOWN-CASTING RECESSED LIGHT FIXTURE



CONCEPT NORTH ELEVATION 4

SCALE 1/8" = 1'-0"

CONCEPT SOUTH ELEVATION 2

SCALE 1/8" = 1'-0"



CONCEPT EAST ELEVATION 3

SCALE 1/8" = 1'-0"

CONCEPT WEST ELEVATION 1

SCALE 1/8" = 1'-0"

AB

DESIGN STUDIO

PHOTOGRAPHY: A T E

PH: 805.963.2100

FX: 805.963.2100

220 EAST HALE STREET

SANTA BARBARA, CALIFORNIA 93101

PROJECT TEAM

[COASTAL CONSISTENCY ANALYSIS]

Norbert Dall, Stephanie Dall

Dall & Associates

930 Florin Road, Suite 200

Sacramento, CA 95831

PH: 916.322.0283

FX: 916.322.0283

e: norbertdall@dalldesign.com

sdall143@aol.com

[GEO/TECHNICAL ENGINEER, ENGINEERING

DESIGNER]

Pat Shiras, John Wallace

Coffon, Shiras & Assoc., Inc.

2804 Camino Dos Rios, Ste 201

Thousand Oaks, CA 91320

PH: 805.375.1050

FX: 805.375.1050

e: jwallace@cotillandshiras.com

[CIVIL ENGINEER]

Charles Grant, ASCE

3000 S. 10th St.

Phoenix, AZ 85004

PH: 330.854.0550

FX: 330.854.0550

e: clgrant@cssnet.com

[BIOLOGIST]

Geoff Smick

WRA, Inc.

2169-G East Francisco Blvd.

San Francisco, CA 94115

PH: 415.454.8868

FX: 415.454.8868

e: smick@wra-ca.com

[COASTAL HAZARDS / WAVE RUNUP]

David Skelly, MS, PE

Geo Soils, Inc.

5741 Palmer Way

Carlsbad, CA 92010

PH: 760.438.3155

FX: 760.438.3155

e: dskelly@geosollisinc.com

[HISTORIC COASTAL SURVEY/ANALYSIS]

Joseph Stepien, MS, CE, LEED

3061 Ruby Drive

Medford, OR 97504

PH: 541.690.7595

FX: 541.690.7595

e: jscapan@charter.net

[SURVEYOR]

Paul Cook

L.P. Cook & Company

1029 State Street

Santa Barbara, CA 93101

PH: 805.966.5105

FX: 805.966.5105

e: pcook@lpcok.com

[C-30026]

5-02-2016

5-02-2016

87-01-2016

PLANNING COMMISSION HEARING

PROJECT #1471

EMPRISE TRUST RESIDENCE

RESIDENTIAL REUSE PROJECT

[PROJECT ADDRESS]

1925 EL CAMINO DE LA LUZ

SANTA BARBARA, CA 93109

[OWNER CONTACT]

EMPRISE TRUST

805.637.9009

A4.01

CONCEPT

EXTERIOR ELEVATIONS

CONCEPT GRADING PLAN



EXHIBIT A8

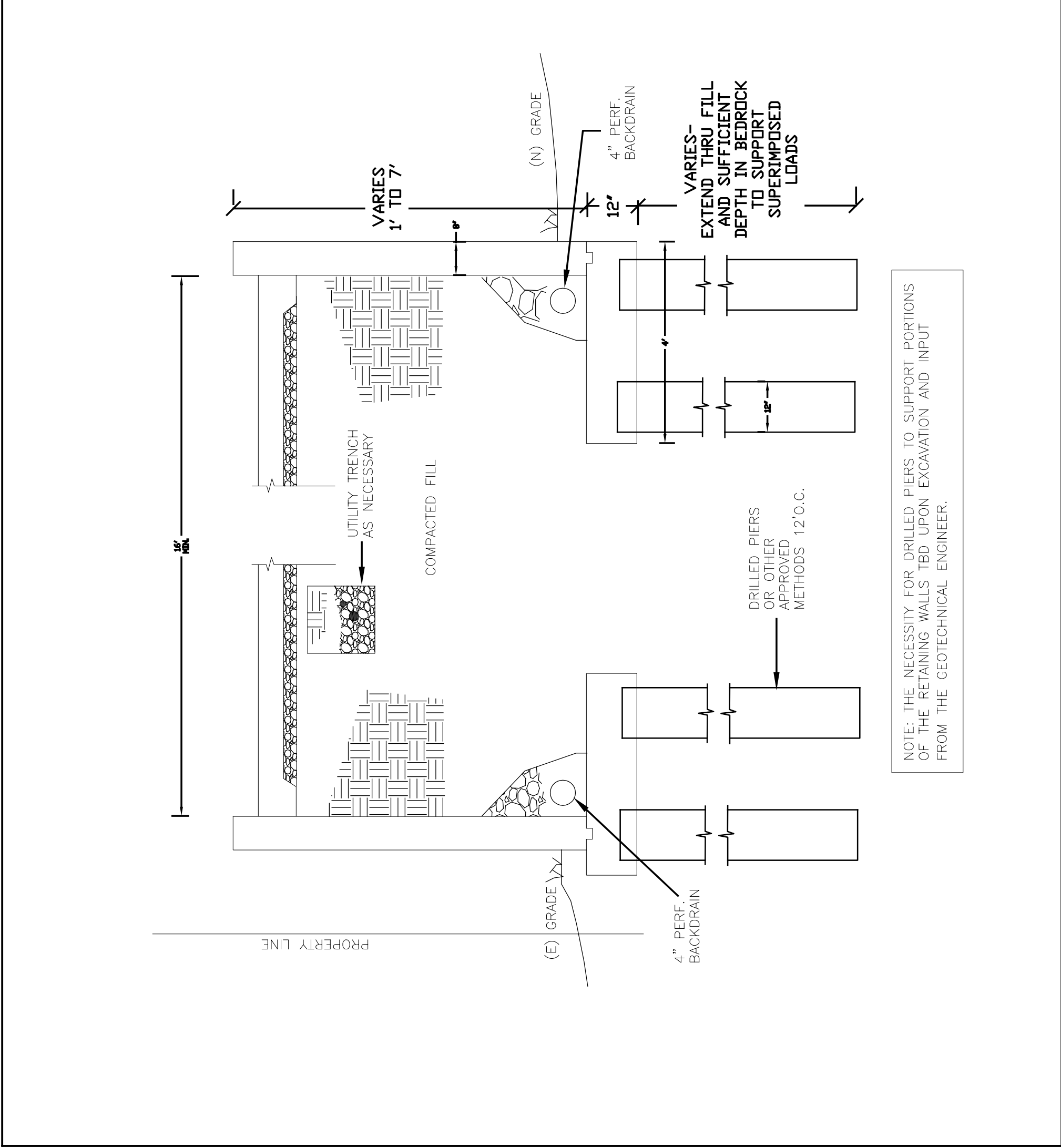
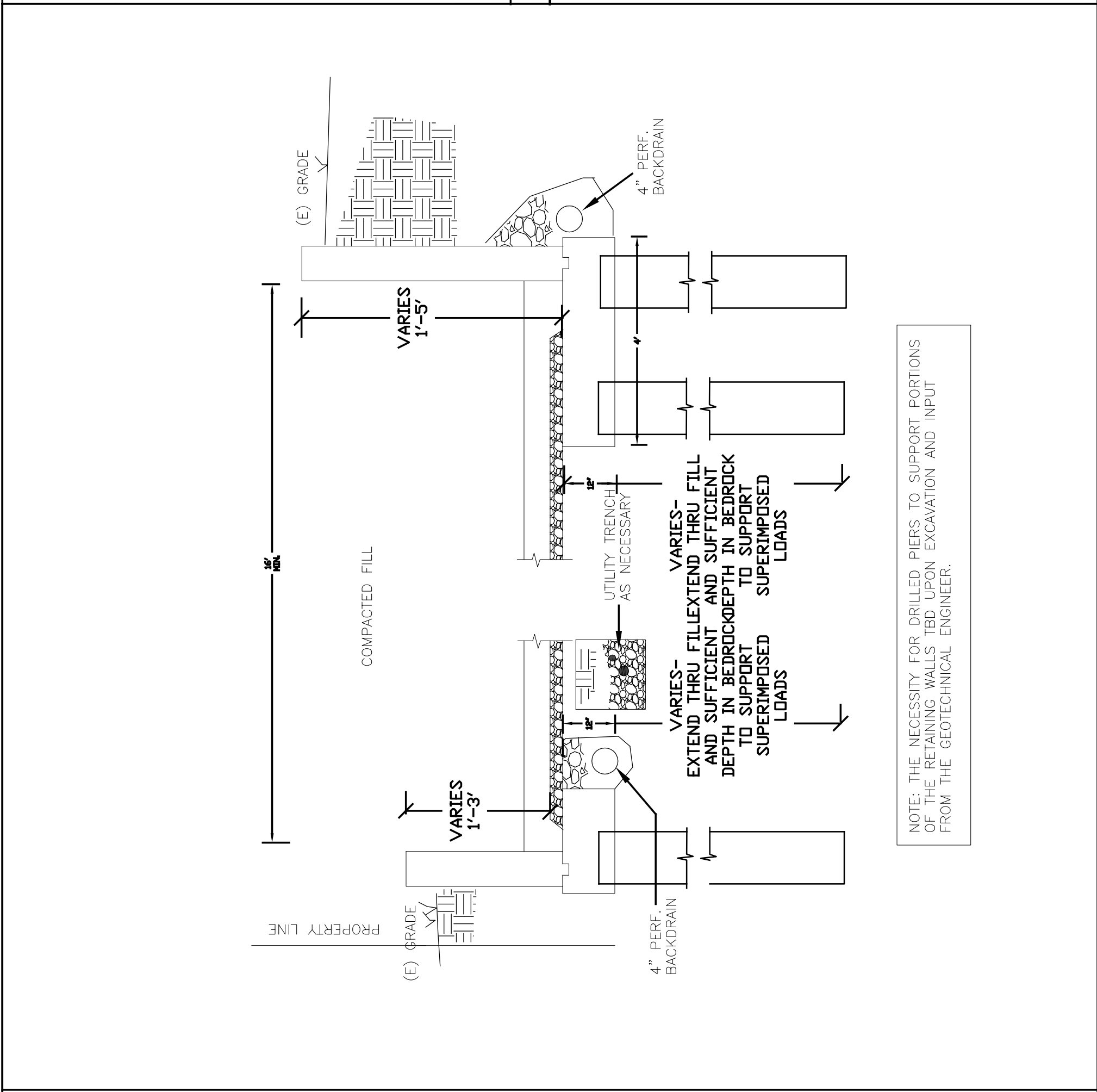
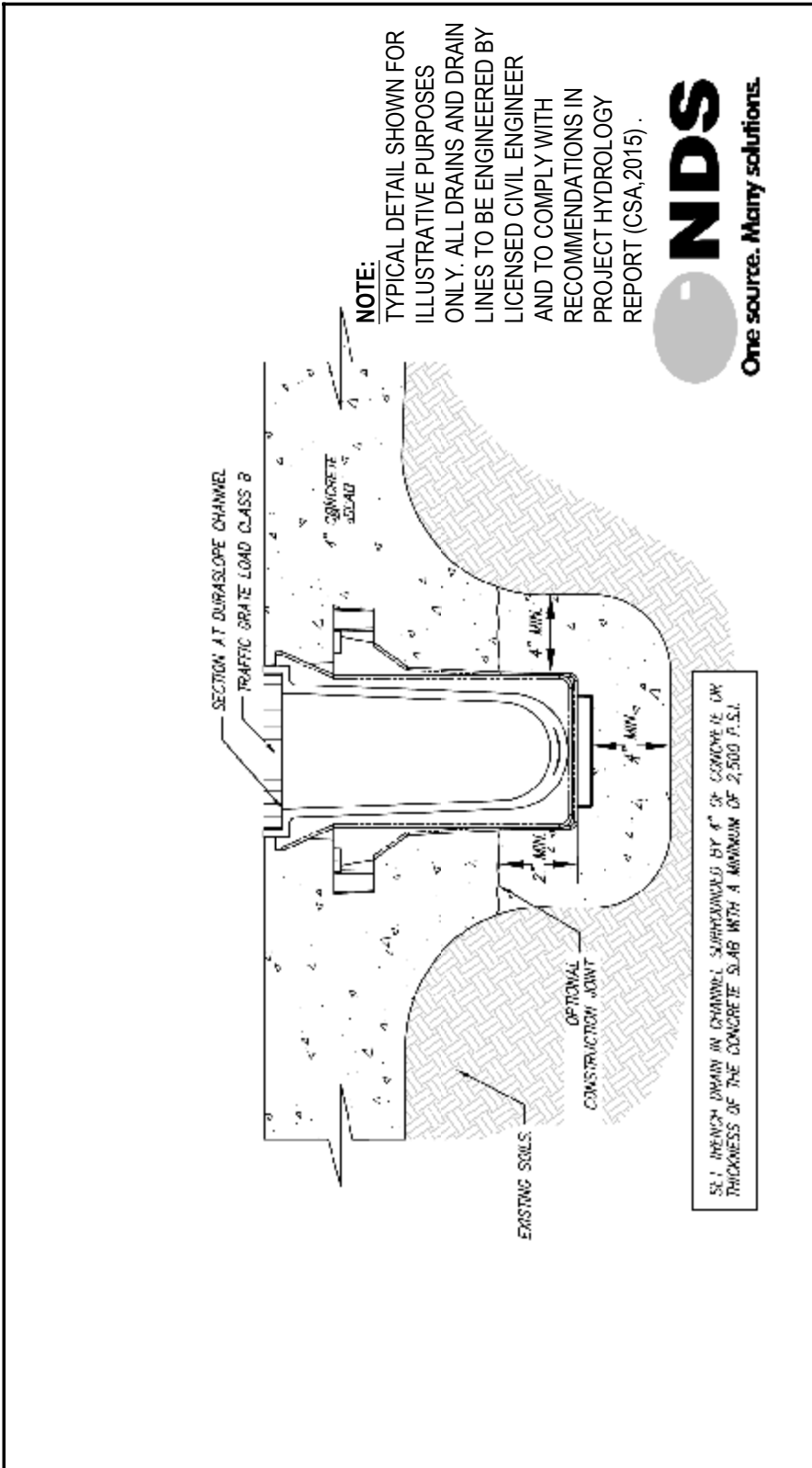
GRADING NOTES:

1. ALL GRADING SHALL COMPLY WITH THE APPROVED FINAL GRADING PLAN, SANTA BARBARA CITY MUNICIPAL CODE, SECTION 22.04.010, 1101 "GRADING," AND BE IN ACCORDANCE WITH THE CONCLUSIONS AND RECOMMENDATIONS OF (1) THE GEOLOGICAL AND GEOTECHNICAL INVESTIGATION REPORT (GSA, 2012), (2) THE BIOLOGICAL RECONNAISSANCE REPORT (WMA, 2012) AND SUPPLEMENT (WMA, 2015), AND (3) THE BIOLOGICAL RECONNAISSANCE REPORT (GSA, 2015), AND (4) THE BIOLOGICAL RECONNAISSANCE REPORT (WMA, 2015) AND SUPPLEMENT (WMA, 2015).
2. GRADING AND FOUNDATION CONSTRUCTION SHALL BE PERFORMED ONLY DURING THE DRY SEASON, BETWEEN MAY 1ST AND OCTOBER 31ST. PRIOR TO START OF CONSTRUCTION THE FOLLOWING SHALL BE PERFORMED: (1) THE PRE-GRADING CONSTRUCTION TESTING AND BUTTERFLY SURVEY RECOMMENDED BY WMA (2012) AND (2) THE INCLINOMETER AND PIEZOMETER MONITORING, AND DOCUMENTATION OF SURFACE CONDITIONS ON THE PARCEL, AS RECOMMENDED BY GSA (2012) AND (3) (2012).
3. THE TOPOGRAPHIC SURVEY MAP OF THE PARCEL, WITH RECORD OF SURVEY BOUNDARIES, GSA (2015) PROVIDES THE ELEVATIONAL BASIS FOR THIS GRADING PLAN.
4. THIS CONCEPTUAL GRADING PLAN EMPHATICALLY REQUIRES REGULAR REVIEW AND APPROVAL, TO AVOID ENVIRONMENTAL VIOLATIONS, OF THE PROJECT GEOLOGICAL AND GEOTECHNICAL HYDROLOGICAL, COASTAL ENGINEERING, BIOLOGICAL, CIVIL ENGINEER, AND ARCHITECTURAL CONSULTANTS, THE APPROVED FINAL GRADING PLAN WILL SHOW OR REFER BY TITLE TO ALL DETAILS AND SPECIFICATIONS NECESSARY TO PERFORM THE PROPOSED WORK, INCLUDING, BUT NOT LIMITED TO SPECIFIC REQUIREMENTS FOR PERFORMANCE BY THE GRADING CONTRACTOR, PROJECT GEOLOGIST OR GEOTECHNICAL ENGINEER, AND PROJECT BIOLOGIST.
5. TEMPORARY EXCAVATIONS IN EXCESS OF 3.5' VERTICAL SHOULD HAVE THE UPPER PORTION TRIMMED TO 1:5:1 VERTICAL TO HORIZONTAL ALUMINUM AND 1:1 IN BEDROCK. TEMPORARY CUT SLOPES SHOULD BE INSPECTED BY A FIELD REPRESENTATIVE OF GSA AT THE TIME OF GRADING AND MONITORED DAILY DURING CONSTRUCTION. EXCAVATION METHODS, SHORING, BRACING, AND SAFETY OF EXCAVATIONS ARE THE RESPONSIBILITY OF THE CONTRACTOR.
6. PRIOR TO PLACEMENT OF FILL MATERIAL, THE AREA TO BE GRADED SHALL BE CLEARED OF ALL VEGETATION, ORGANIC MATERIALS, CONCRETE ROCKS GREATER THAN 1FT LONG, DEBRIS, AND ANY OTHER DELETERIOUS MATERIAL, INCLUDING, BUT NOT LIMITED, TO TOXIC INTERSTICES. THESE MATERIALS SHOULD BE STRIPPED AND REMOVED FROM THE GRADELINE AND DEPOSITED ON THE PARCEL, FOR DISPOSAL OFF SITE AND COMPILE THE COSTS OF THE MATERIALS PURSUANT TO THE CABLE REQUIREMENTS. THE GRADING CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROPER DISPOSAL OF ALL MATERIALS REMOVED FROM THE GRADELINE AND DEPOSITED ON THE PARCEL, IN ACCORDANCE WITH THE STANDARDS DURING GRADING AND CONSTRUCTION PER THE EROSION CONTROL MEASURES SPECIFIED ON THE INTERNAL GRADING/DRAINAGE CONTROL PLAN (AGRS, 2016).
7. MATERIALS TO BE FILLED AT OR BELOW FINISH ELEVATION 10 FEET. THE EXPOSED SURFACE SHOULD BE SUBMITTED TO AT LEAST 1 AND 1/8 INCH DEPTH, A MINIMUM OF 10% COMPACTED TO AT LEAST OPTIMUM MOISTURE CONTENT AND COMPACTED TO AT LEAST 90 PERCENT RELATIVE COMPACTION BASED ON STANDARD 1557-121. FILL PLACED IN SLOPES SHALL BE KEPT AND BENCHED.
8. EXCAVATED MATERIAL MAY BE RE-USED AS COMPACTED FILL PROVIDED IT IS FREE OF ORGANIC MATTER AND MATERIAL LARGER THAN 1/4 IN DIAMETER. IMPORTED FILL SHOULD BE FREE OF ORGANIC MATERIAL AND BE CERTIFIED WHEAT, CONTAIN NO MATERIAL LARGER THAN LANCHES, AND SHOULD HAVE A PLASTICITY INDEX (PI) OF LESS THAN 16. THE FILL SHOULD BE PLACED IN HORIZONTAL LIFTS NOT EXCEEDING 18 INCHES THICKNESS, MOISTURE CONDITIONED TO AT LEAST OPTIMUM MOISTURE CONTENT AND COMPACTED TO AT LEAST 90 PERCENT RELATIVE COMPACTION. BENCHES AT STRUCTURES, SLABS, AND WITHIN 18 INCHES OF THE AGGREGATE BASE ARE STRUCTURAL AND ARE SUPPORTED ON DRILLED PIERS AND GRADE BEAMS.
9. STRUCTURAL AND PERVIOUS BACKFILL MATERIAL SHALL MEET THE REQUIREMENTS SPECIFIED FOR STRUCTURAL OR PERVIOUS BACKFILL IN SECTION 3203.3 OF THE CALIFORNIA CIVIL ENGINEERING BOARD'S PUBLIC WORKS CONSTRUCTION "GREENBOOK," 2006 EDITION. STRUCTURAL AND PERVIOUS BACKFILL SHOULD BE COMPACTED TO 90% RELATIVE COMPACTION.
10. AT THE COMPLETION OF COMPACTION, THE STOCKPILED PREVIOUSLY EXCAVATED TOPSOIL OR SUITABLE FILL MAY BE USED FOR FINAL GRADING AS REQUIRED FOR RESTORATION LANDSCAPING.
11. THE PROJECT BIOLOGIST SHALL BE RETAINED PRIOR TO THE START OF GRADING OR CONSTRUCTION, WHICHEVER COMES FIRST, TO MONITOR THE SITE AND ADJACENT AREA AS RECOMMENDED BY WMA (2012, 2015). THE PROJECT GEOLOGIST OR GEOTECHNICAL ENGINEER SHALL BE RETAINED DURING SITE GRADING AND CONSTRUCTION TO MONITOR THE GRADING AND CONSTRUCTION FOR COMPLIANCE WITH THE GRADING PLAN AND TO MONITOR FOR ANY SUBSTANTIAL CHANGE IN THE GRADING OR CONSTRUCTION. ANY CHANGES CONSISTENT WITH ISSUED PROJECT ENTITLEMENTS, IN THE EVENT THAT SURVIVABLE CONDITIONS OR METHODS OF CONSTRUCTION DIFFER FROM THOSE THAT HAVE BEEN OBSERVED, PROVIDED, THAT ANY SUBSTANTIAL CHANGE IN THE VOLUME OR EXTENT (V, H) OF GRADING SHALL REQUIRE PRIOR COORDINATION WITH THE RESPONSIBLE CITY OFFICIALS AND, AS APPLICABLE, THEIR WRITTEN APPROVAL.
12. A TRUE AND COMPLETE COPY OF EACH PROJECT ENTITLEMENT (COASTAL DEVELOPMENT PERMIT, GRADING PERMIT, ETC.) AND A FULL SET OF APPROVED GRADING AND CONSTRUCTION DRAWINGS SHALL BE MAINTAINED AT THE PROJECT SITE FOR USE BY THE CONTRACTOR, INCLUDING ANY SUBCONTRACTORS, DURING THE PROJECT GRADING AND CONSTRUCTION PERIOD.
13. TABLE 1, EARTHWORK CALCULATIONS, CONTAINS THE ESTIMATED PROJECT GRADING VOLUMES.
14. THE DRILLED PIERS AND TIEBACKS THAT MAKE UP THE LOWER AND UPPER SHEAR PINS AND INTERIOR CASSIONS AS SHOWN IN THIS GRADING PLAN ARE PER RECOMMENDATIONS MADE BY GSA AND CONCEPTUAL DESIGN BY THE PROJECT CIVIL ENGINEER, CHARLES GRAMMIDWEST FOUNDATION TECH, INC.
15. INSTALLATION OF LOWER AND UPPER SHEAR PINS TO BE COMPLETED BEFORE THE TIEBACKS ARE INSTALLED. POST-TENSIONING OF THE TIEBACKS SHALL BE COMPLETED AFTER PLACEMENT OF THE WHALER GRADE BEAM AND THE CONCRETE IS CURED TO 4000 PSI.
16. RAINING WALLS SHALL BE SUPPORTED ON DRILLED, CAST-IN-PLACE PIERS OR OTHER APPROVED METHOD IN THE CONSTRUCTION PLANS AND BUILDING GRADING PERMITS. BACK DRAINING SHOULD BE CONSTRUCTED BEHIND ALL RAINING WALLS. THE BACK DRAIN SHOULD CONSIST OF 12-INCH WIDE CONTINUOUS BLANKET OF EITHER CALTRANS CLASS 2 PERMEABLE MATERIAL, OR 3 X 12" CLINCH CRUSHED DRAIN ROCK ENCLOSED IN A MINIMUM 4" (OR APPROVED EQUIVALENT) FILTER FABRIC, AND EXTENDED TO 40 PERCENT DEEPER THAN THE DEEPEST EXCAVATION. THE BACK DRAIN SHOULD BE PLACED NEAR THE DRAIN ROCK, SURROUNDING WITH A MINIMUM 4" OF DRAIN ROCK WITH AT LEAST 2' OF DRAIN ROCK UNDERLYING THE 4" PIPES. ALL BACK DRAIN PIPES SHOULD BE SLOPED TO DRAIN AT A MINIMUM OF 1/2 PERCENT AND BE COLLECTED IN 6" DIAMETER, NON-PERFORCATED SCHEDULE 40 PVC PIPES, SLOPED A MINIMUM OF 2 PERCENT. ALL COLLECTED WATER SHALL BE DIRECTED TO THE COBBLEDRAIN DRAIN LINES IN THE LUTHERVILLE OPEN SPACE OR HORIZONTAL LUTHERVILLE BERRY MAINLINE PIPES.
17. UTILITY TRENCHES SHOULD BE BACKFILLED WITH APPROVED ON-SITE SOIL. BEDDING MATERIALS FOR PIPES SHOULD BE GRADED AND PLACED IN ACCORDANCE WITH THE CITY OF SANTA BARBARA STANDARD SPECIFICATIONS FOR CONSTRUCTION OF PUBLIC UTILITIES. ALL TRENCHES SHALL BE BACKFILLED WITH COMPACTED CLEAN FILL THAT IS SUITABLE FOR WORK IN CONFINED AREAS WITHOUT DAMAGING TRENCH WALLS OR CONDUITS.
18. VIBES IN THE CITY'S 1978 GRADING ENVELOPE ON THE PARCEL, SOUTH OF THE PROPOSED SHEAR PIN ROW, WILL BE FILLED AND CARPES FROM COMPACTED CLEAN FILL MATERIAL EXCAVATED AT THE PROJECT SITE.
19. CONDUITS FOR INFRASTRUCTURE SHALL BE DESIGNED AND CONSTRUCTED TO SEISMIC STANDARDS.
20. THE CONCEPTUAL PERMANENT DRAINAGE PLAN THAT IMPARTS THE PROJECT HYDROLOGY REPORT (GSA, 2015), THE GEOLOGICAL-GEOTECHNICAL INVESTIGATION REPORT (GSA, 2012, AND SUPPLEMENT, 2015) IS PROVIDED ON SHEET CD-1.

CONCEPT GRADING SITE SECTION A



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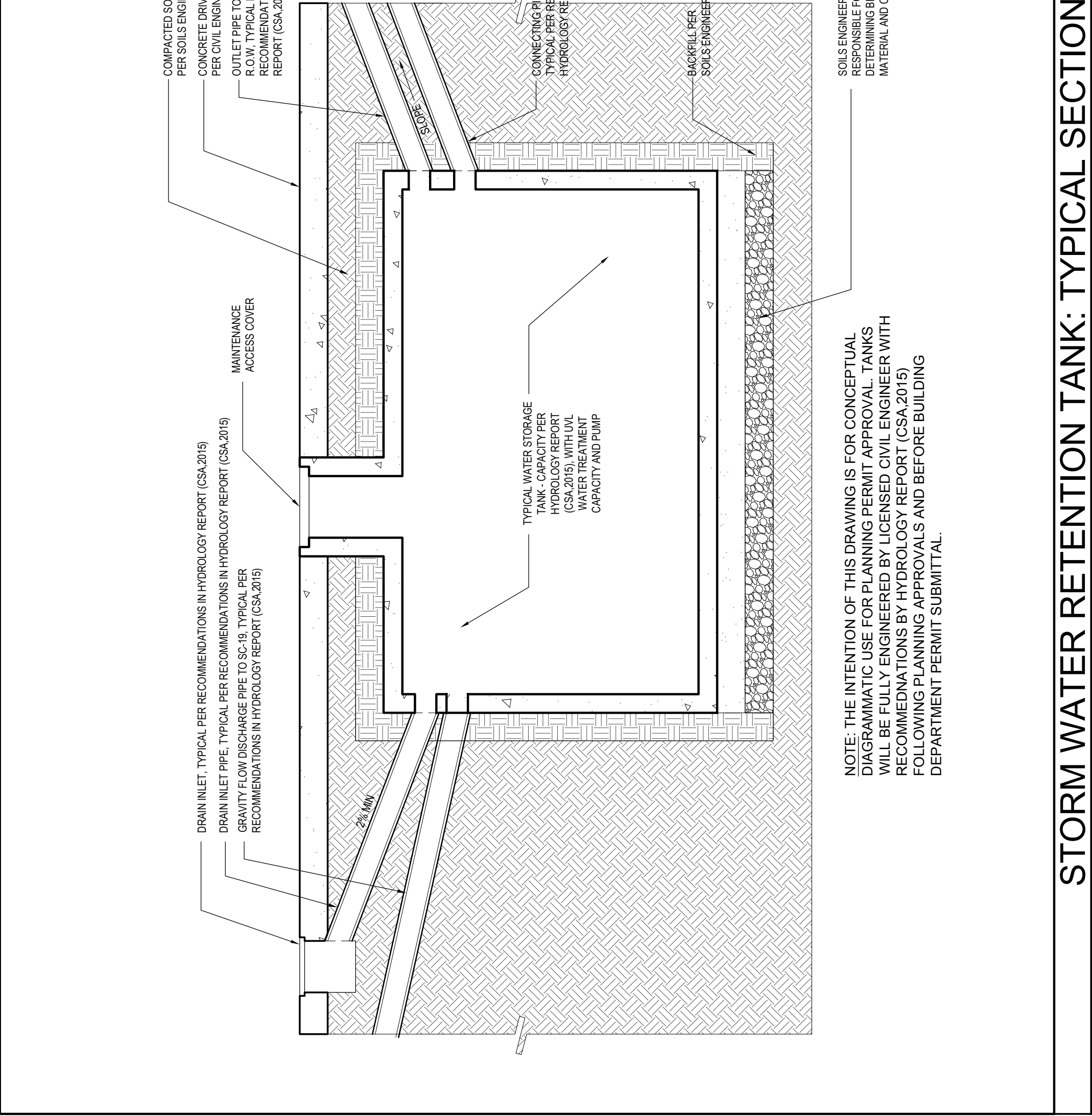
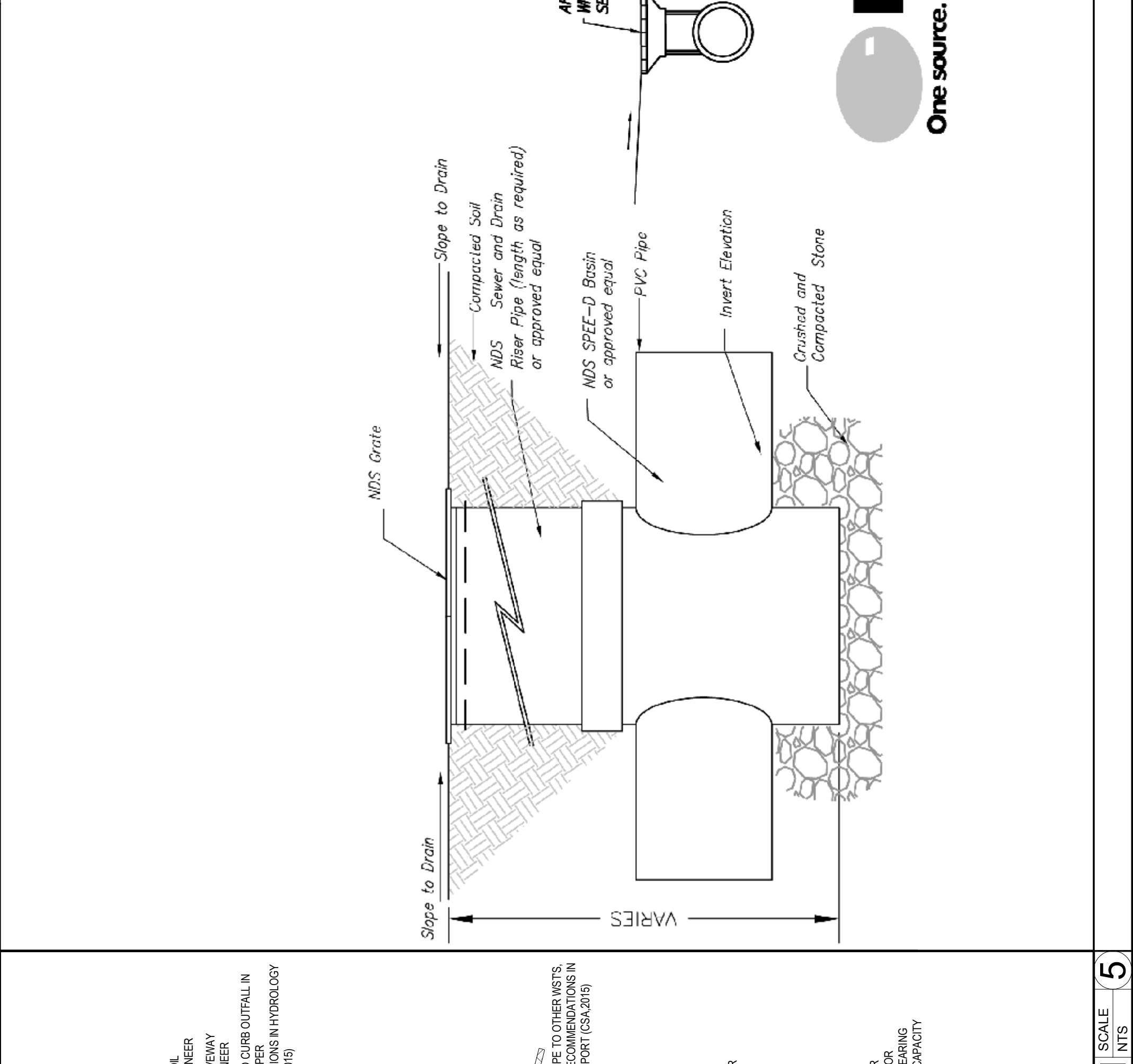
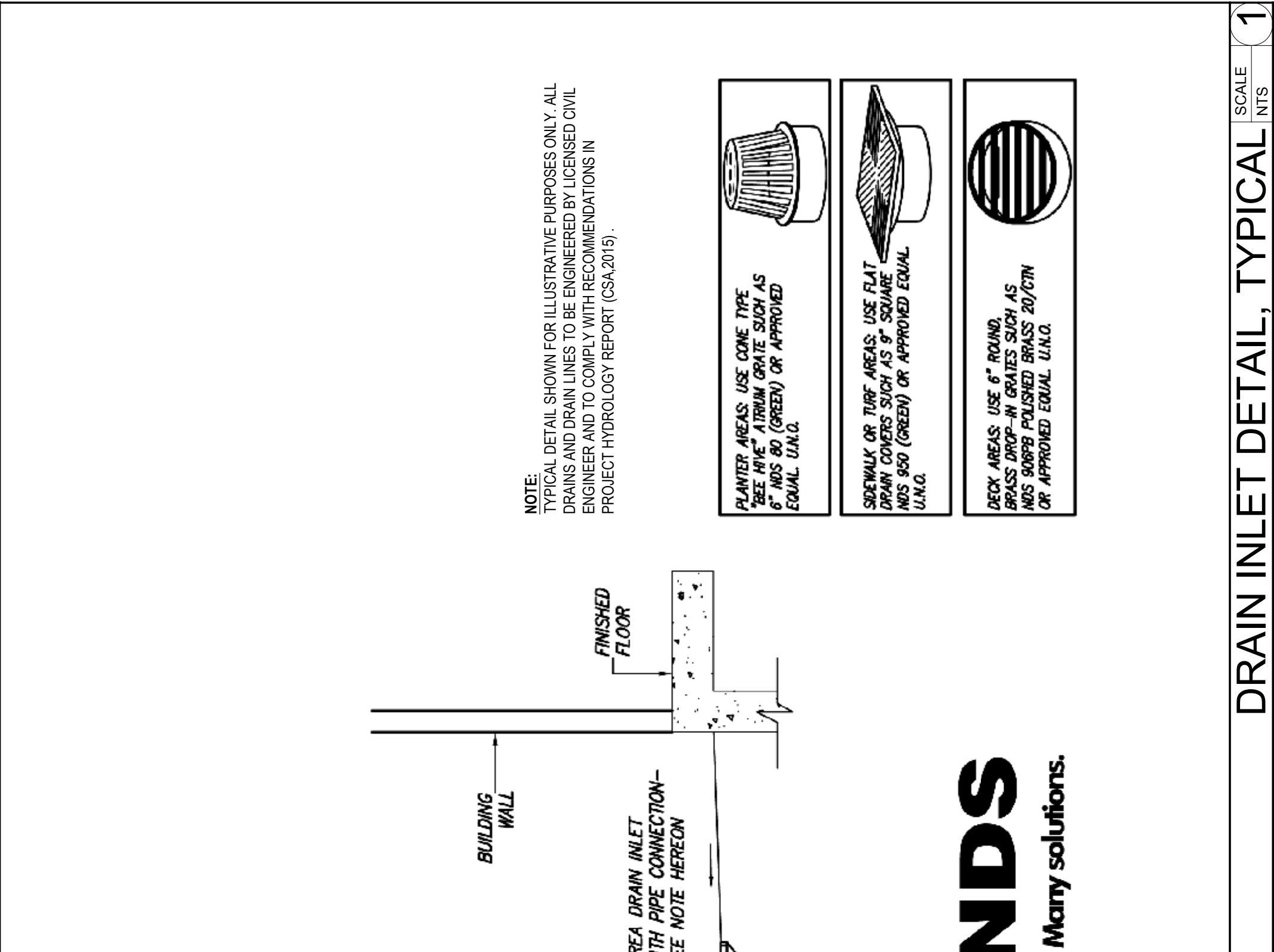


TRENCH DRAIN DETAIL, TYPICAL

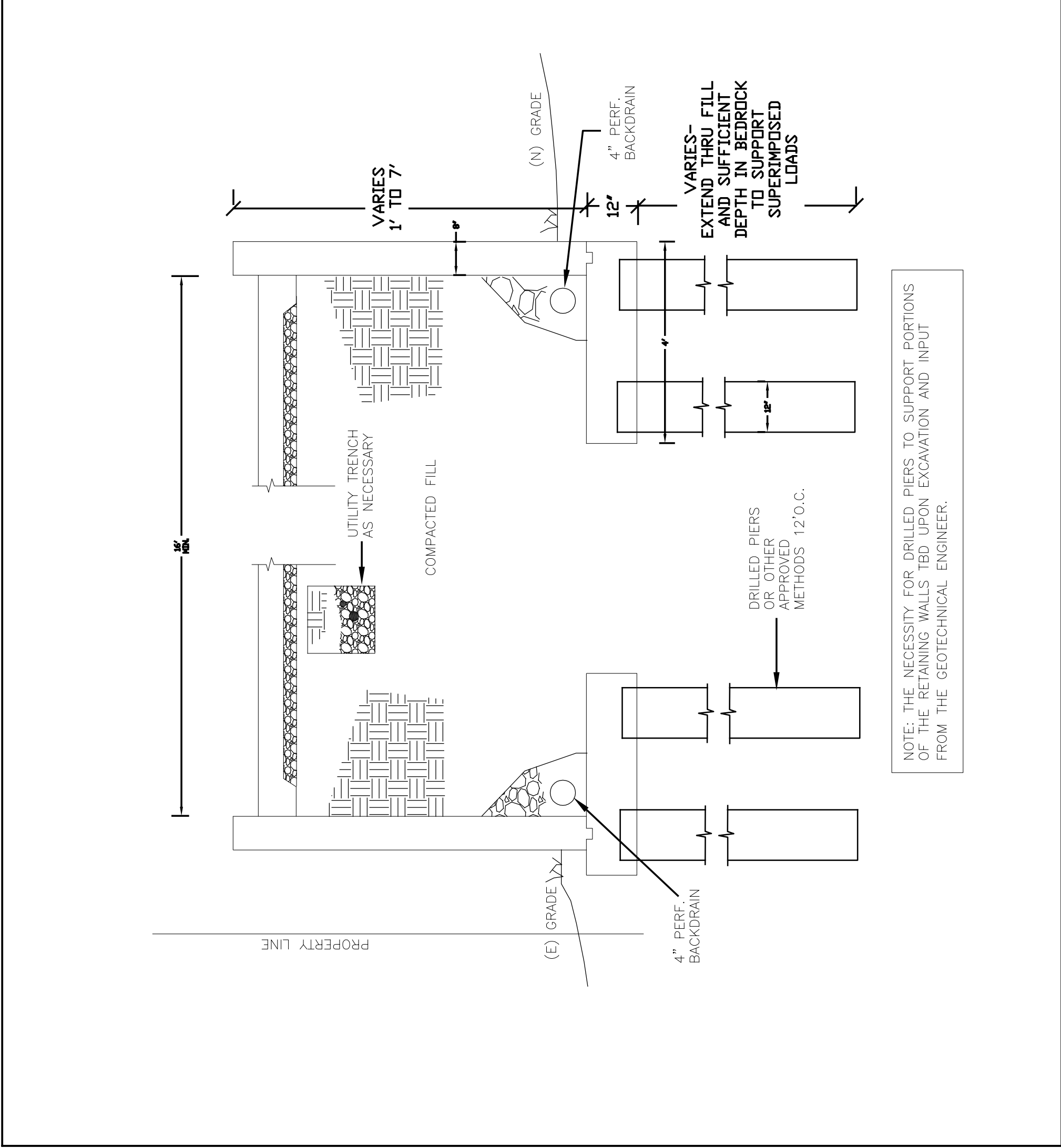
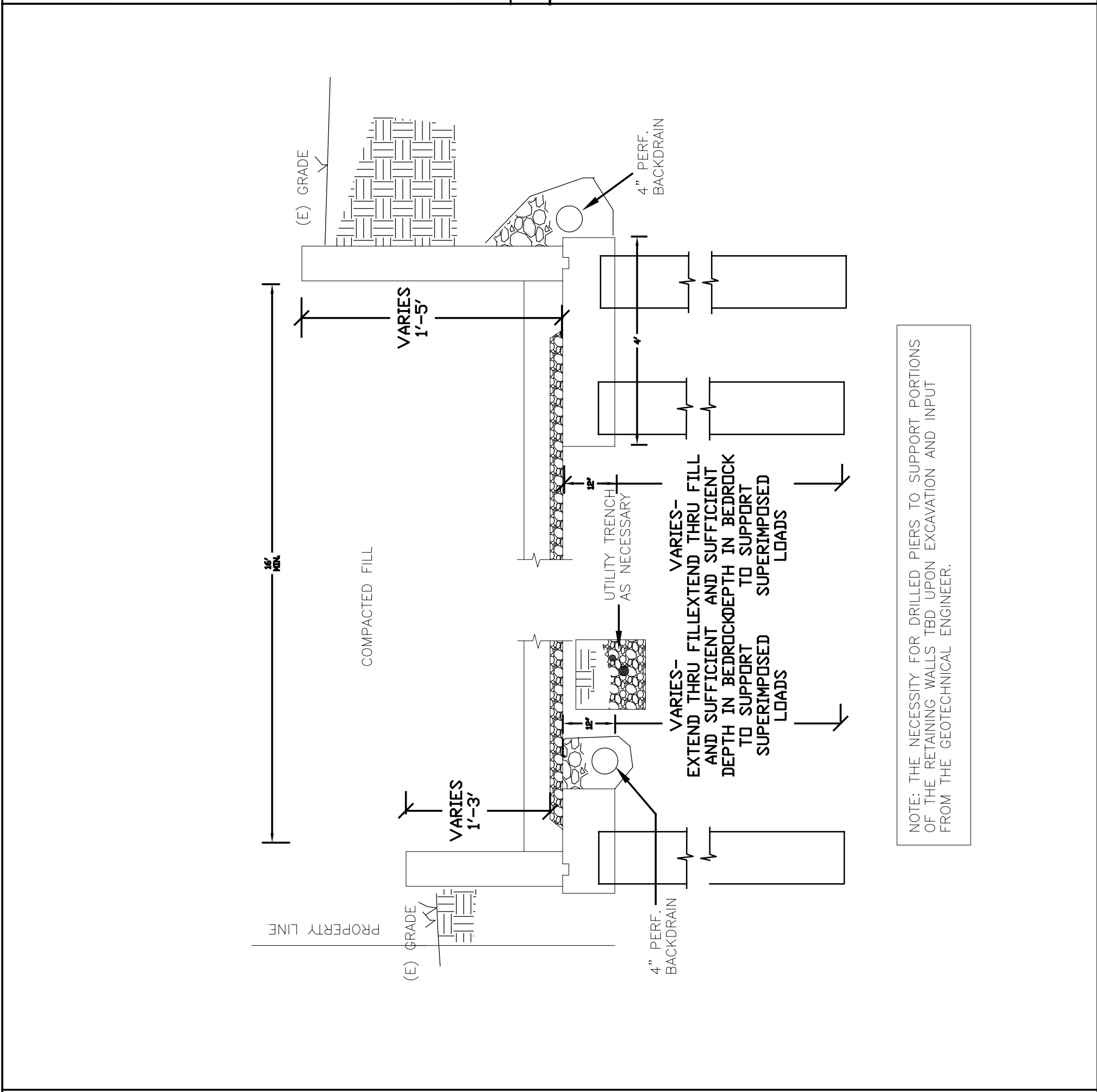
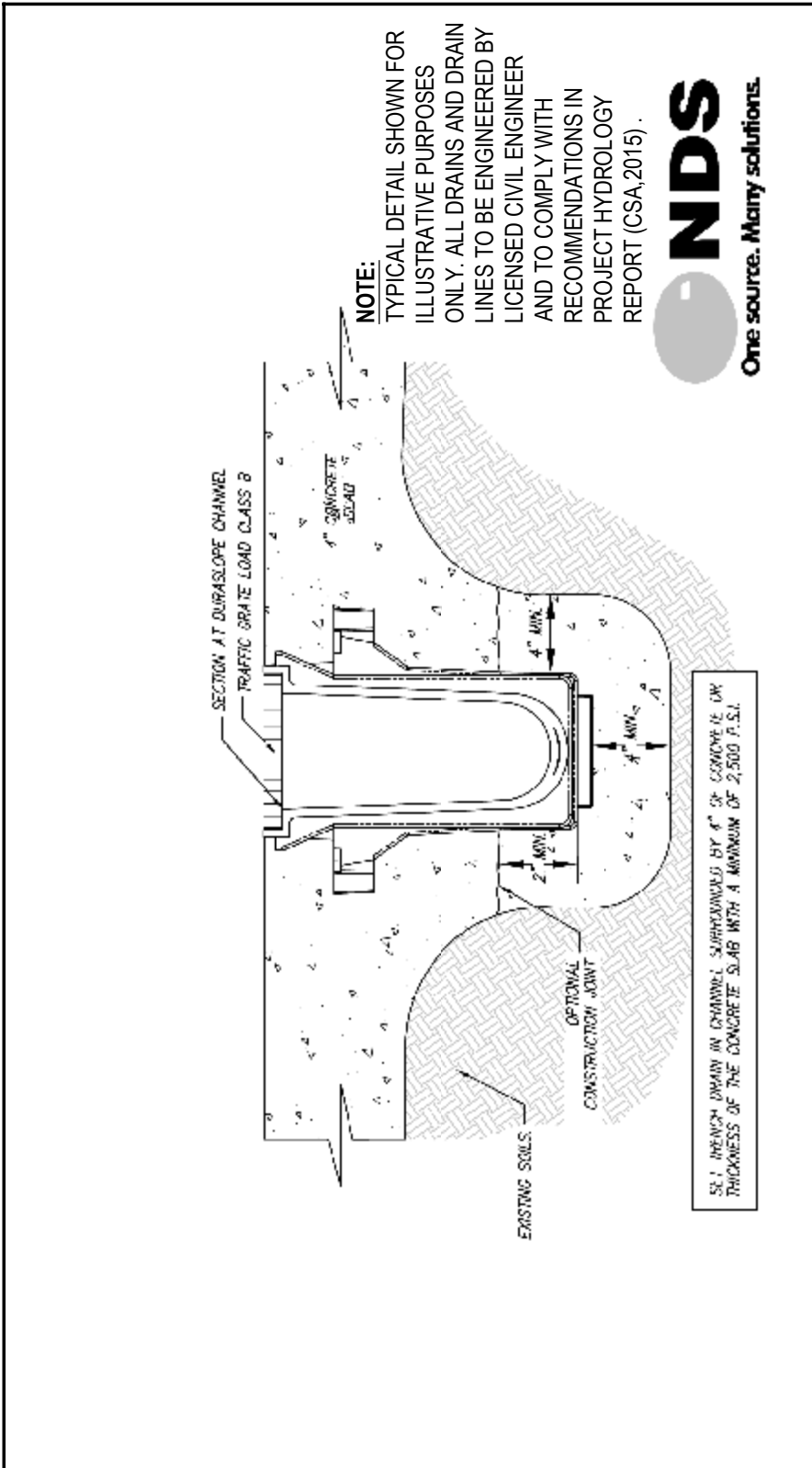
AREA CATCH BASIN DETAIL, TYPICAL

SECTION C: DRIVEWAY IN CUT

SECTION B: DRIVEWAY IN FILL



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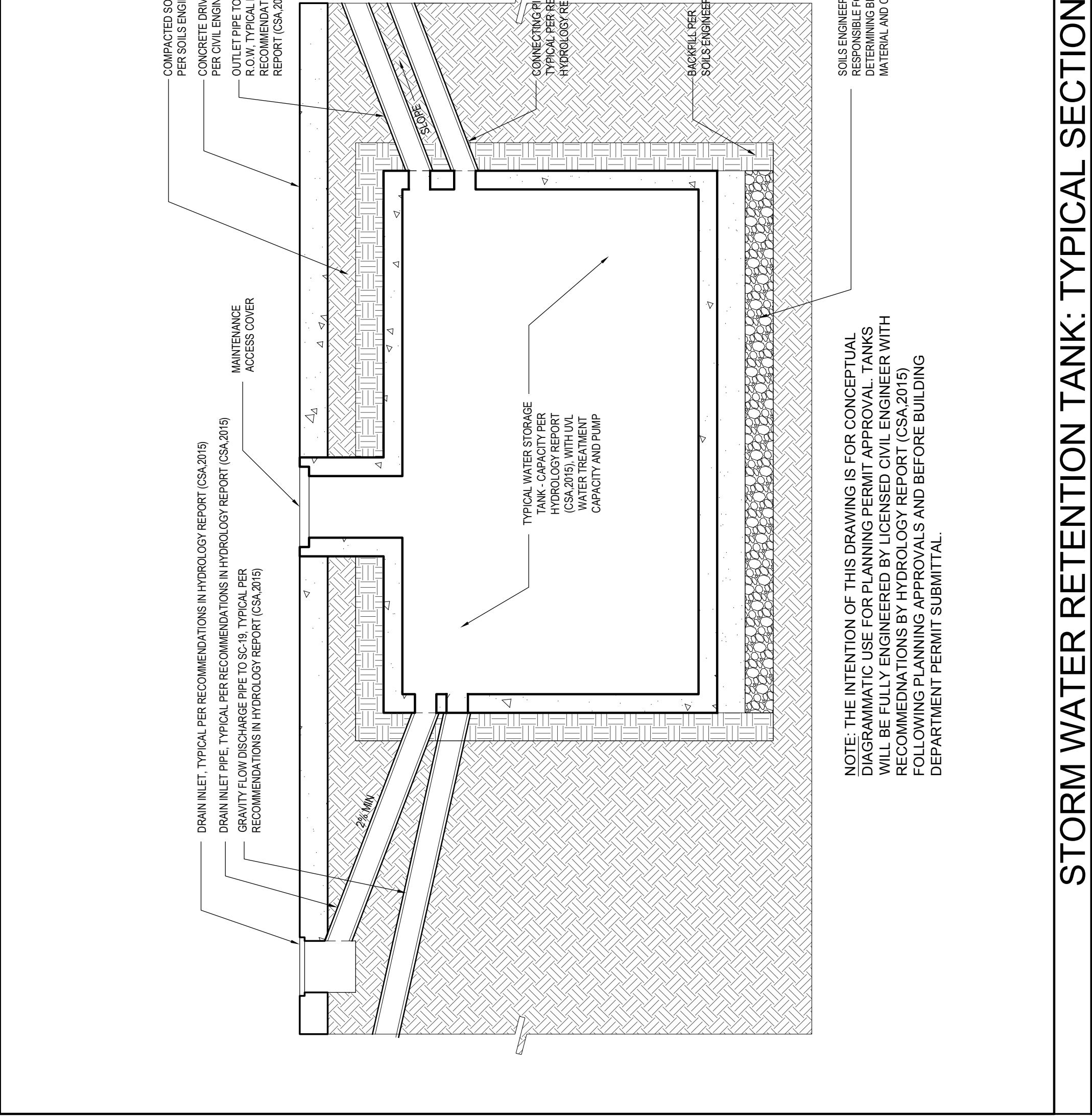
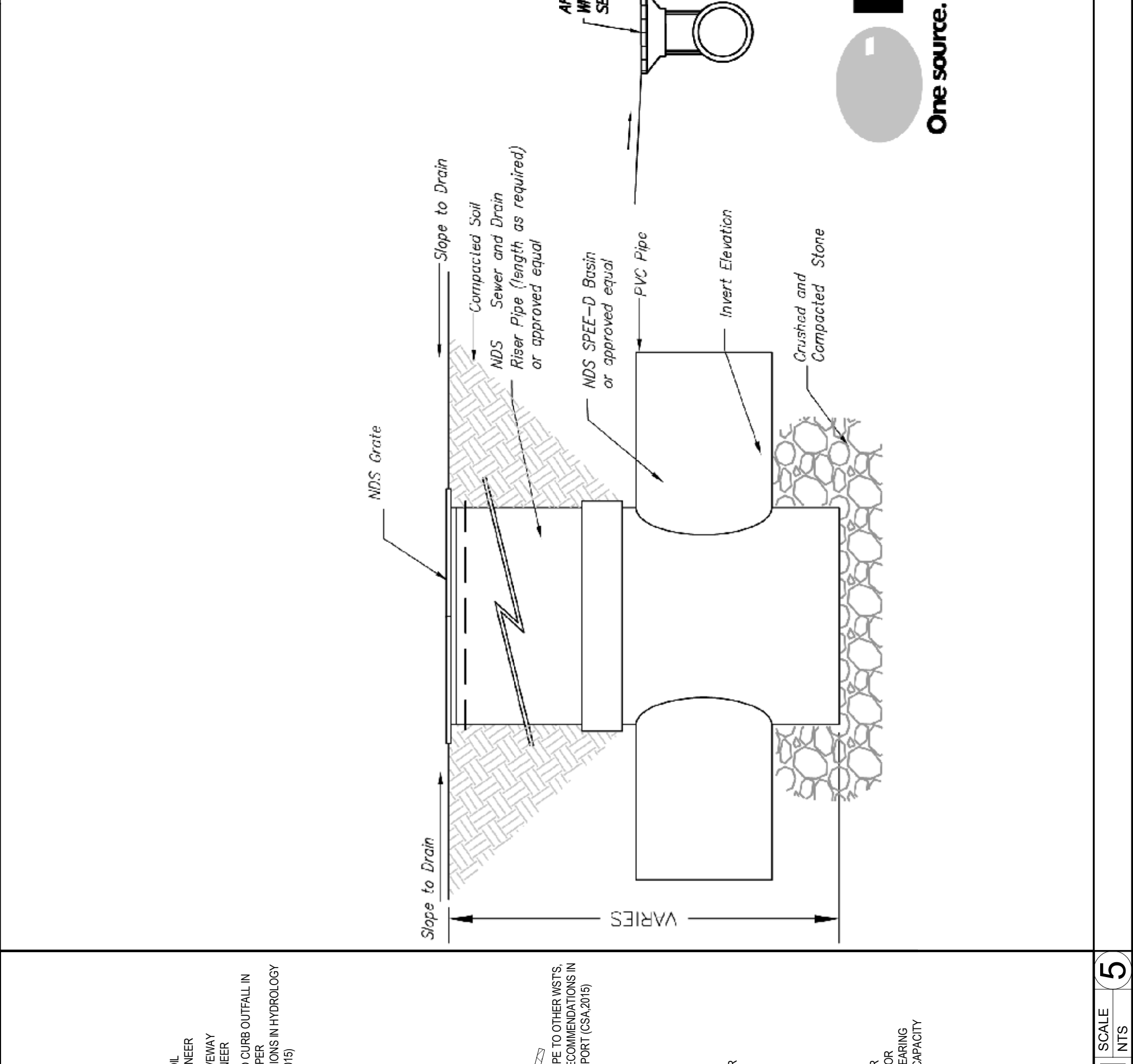
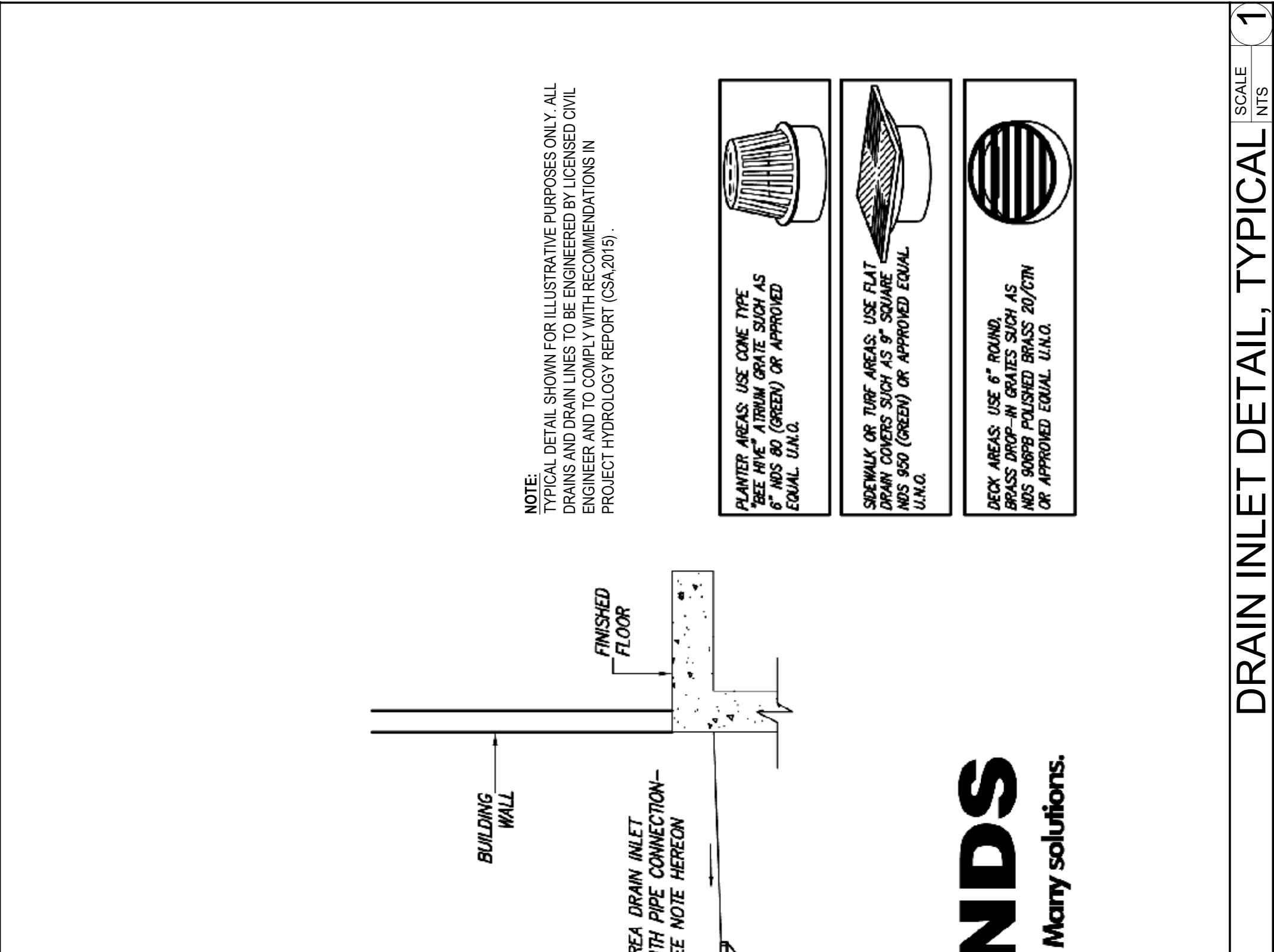


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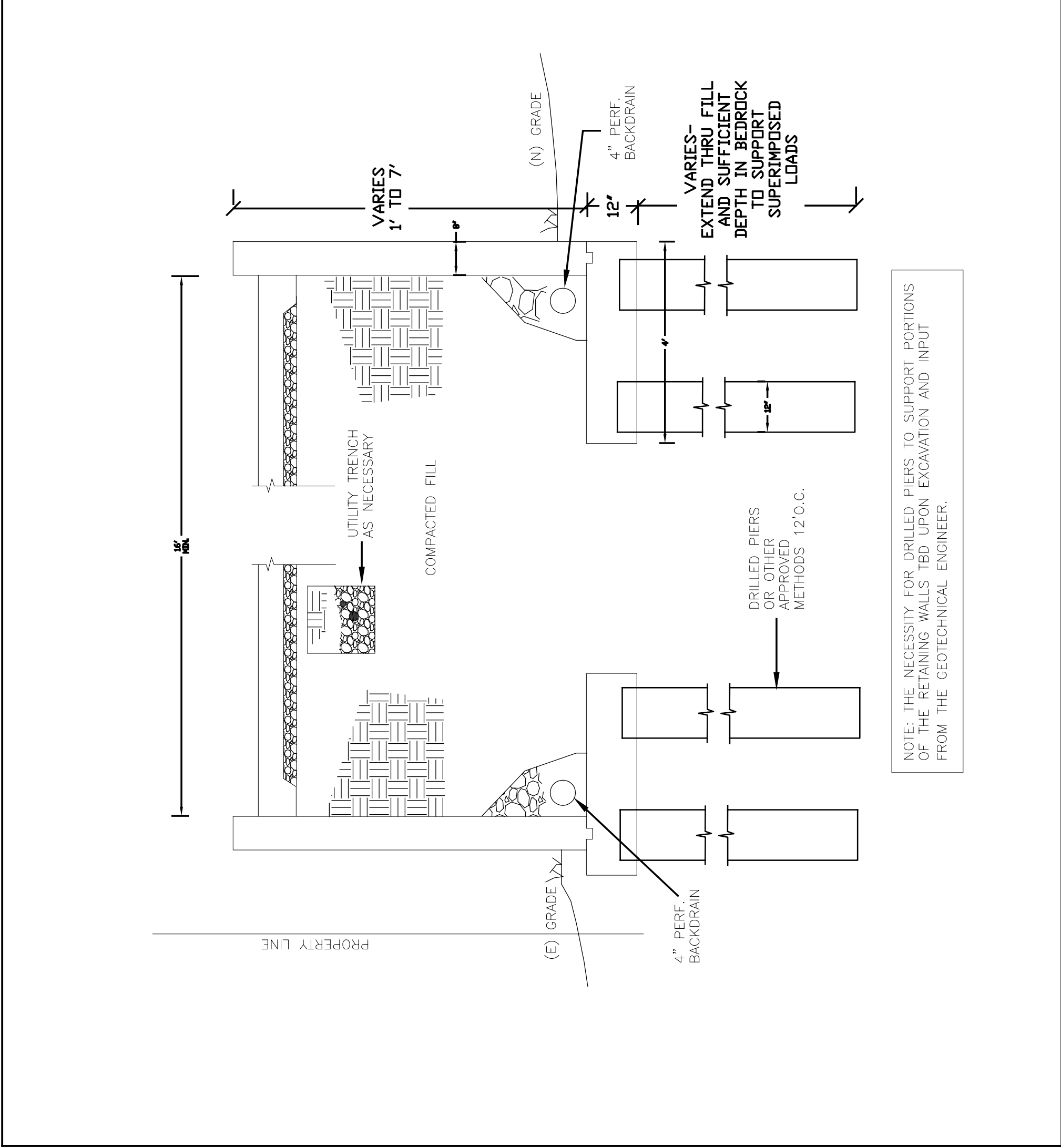
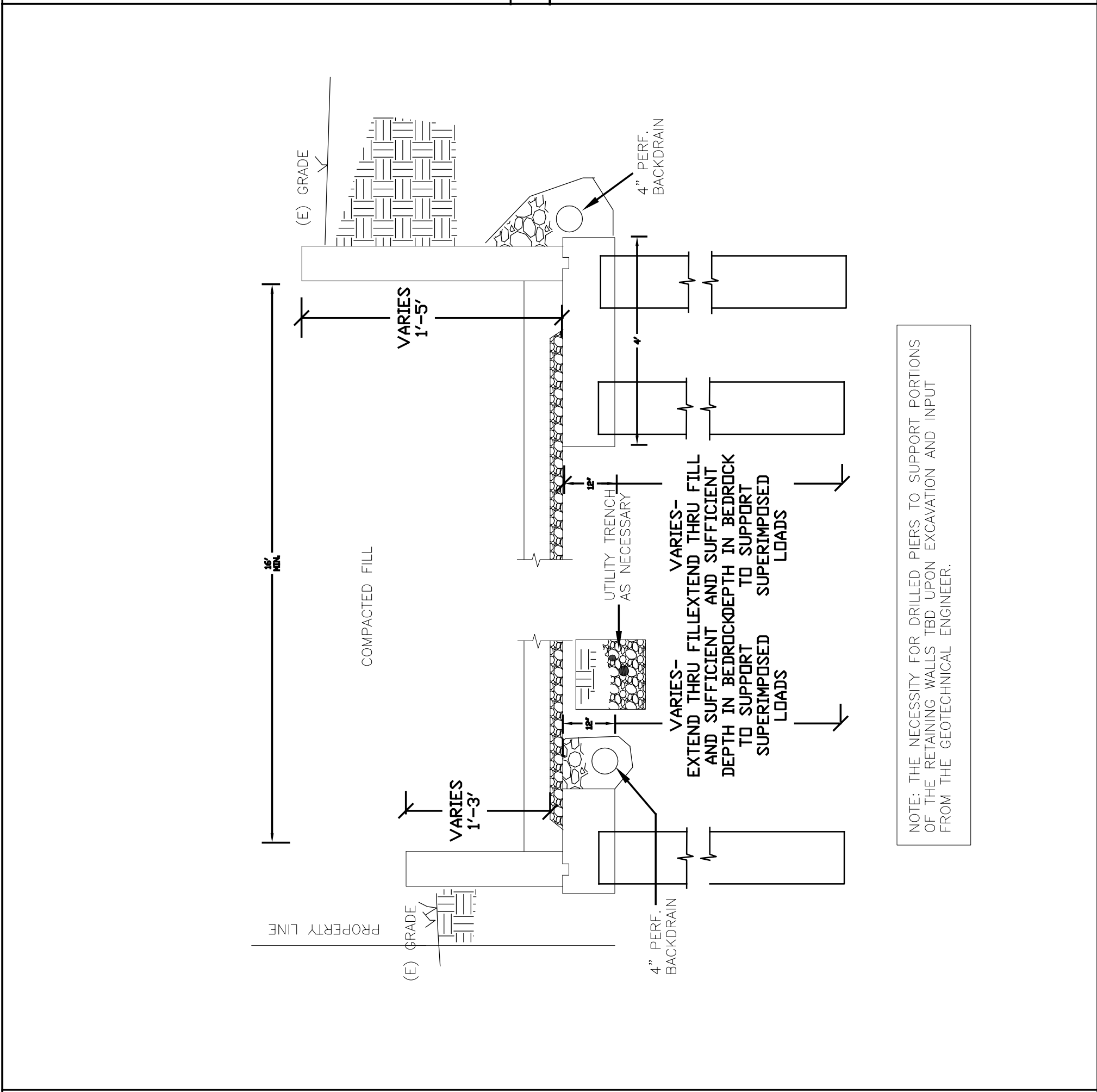
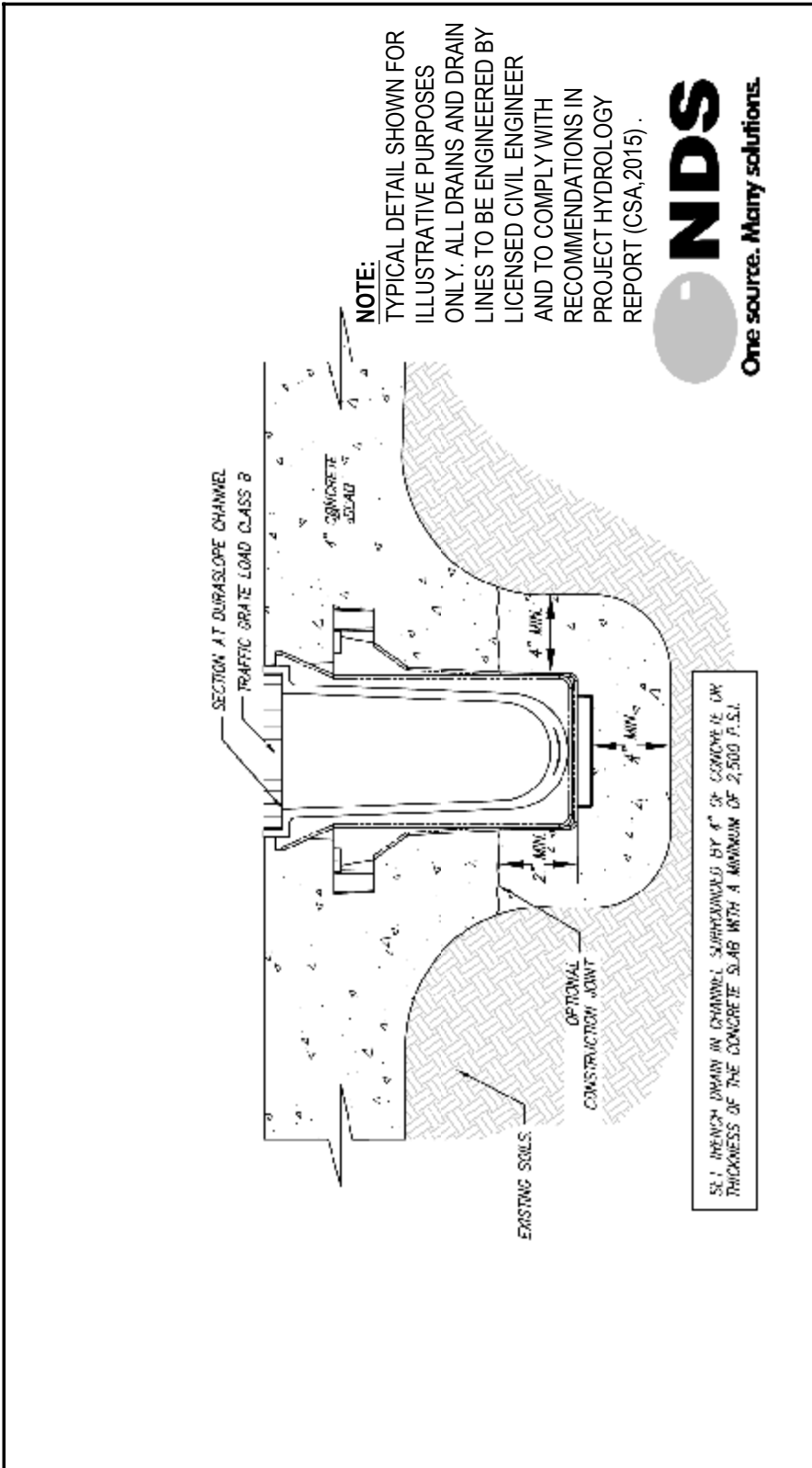
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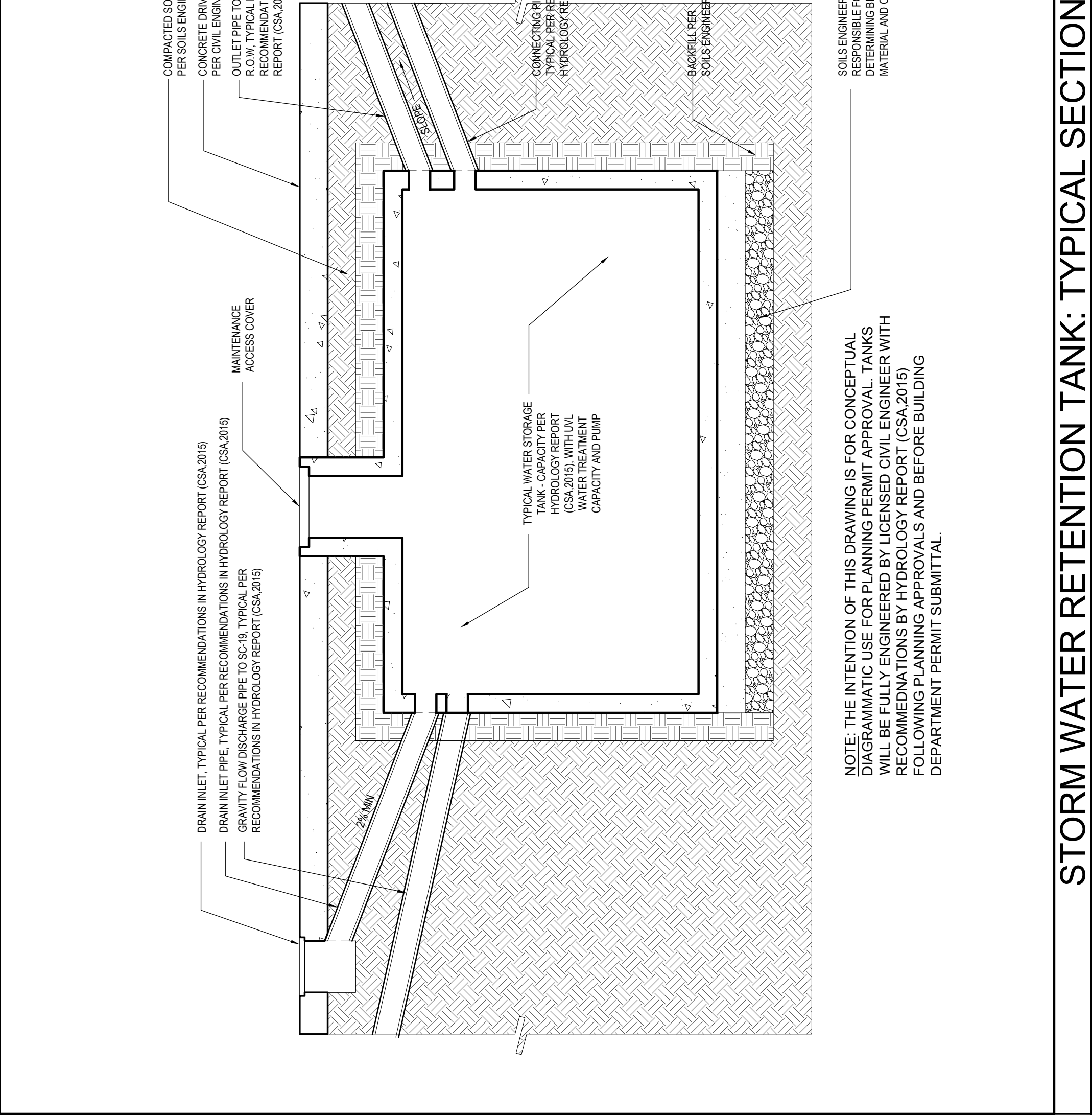
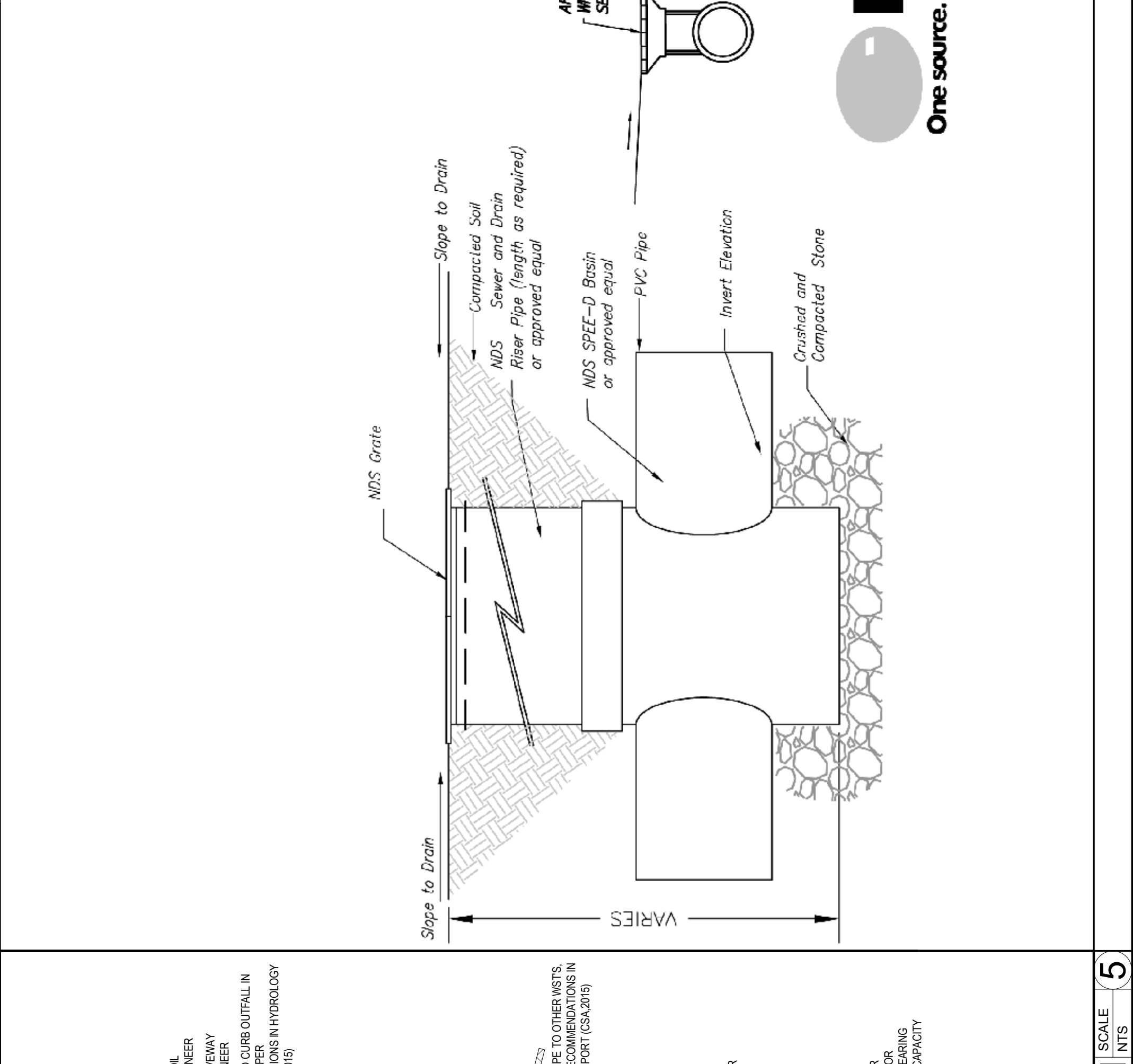
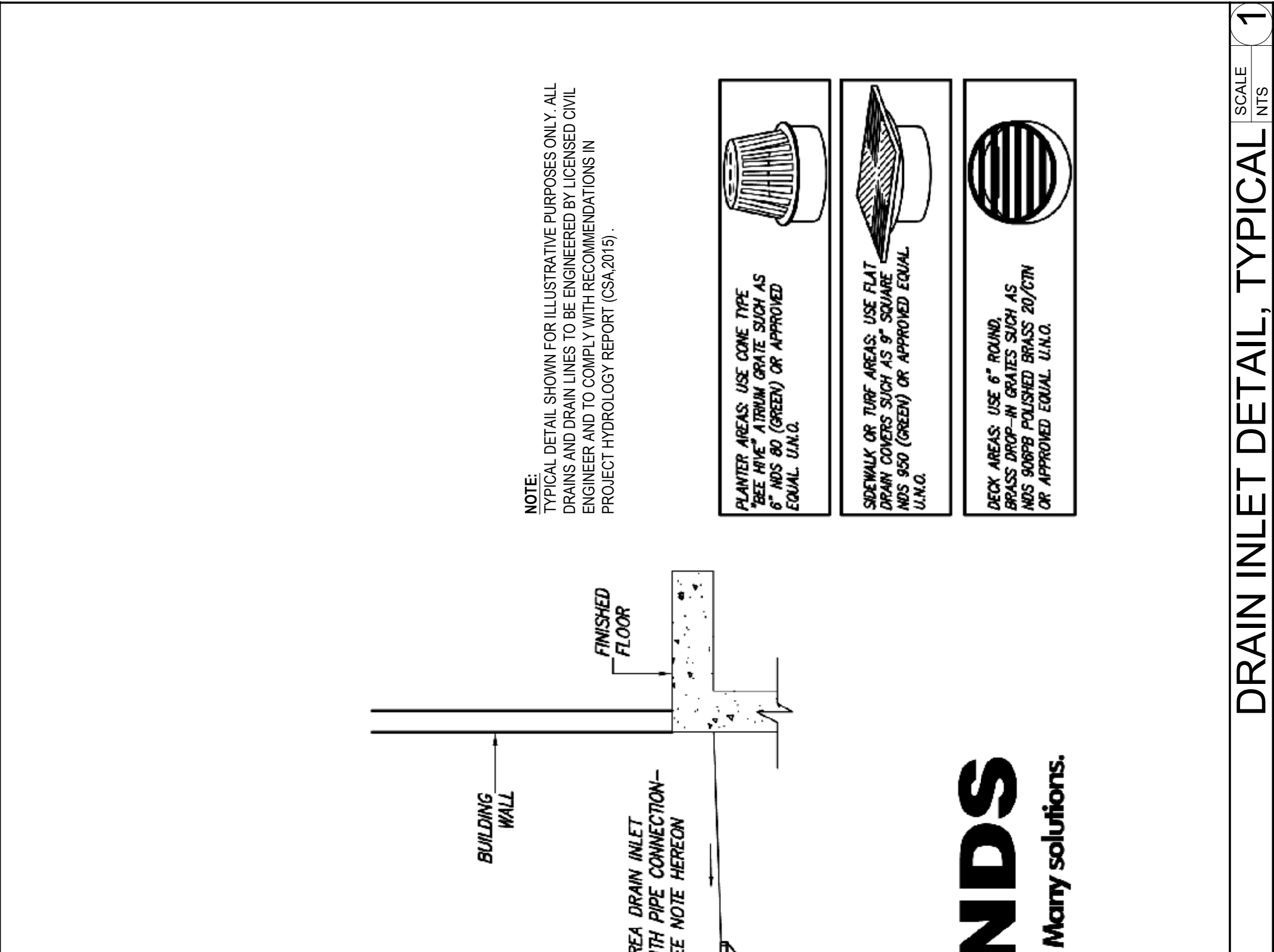


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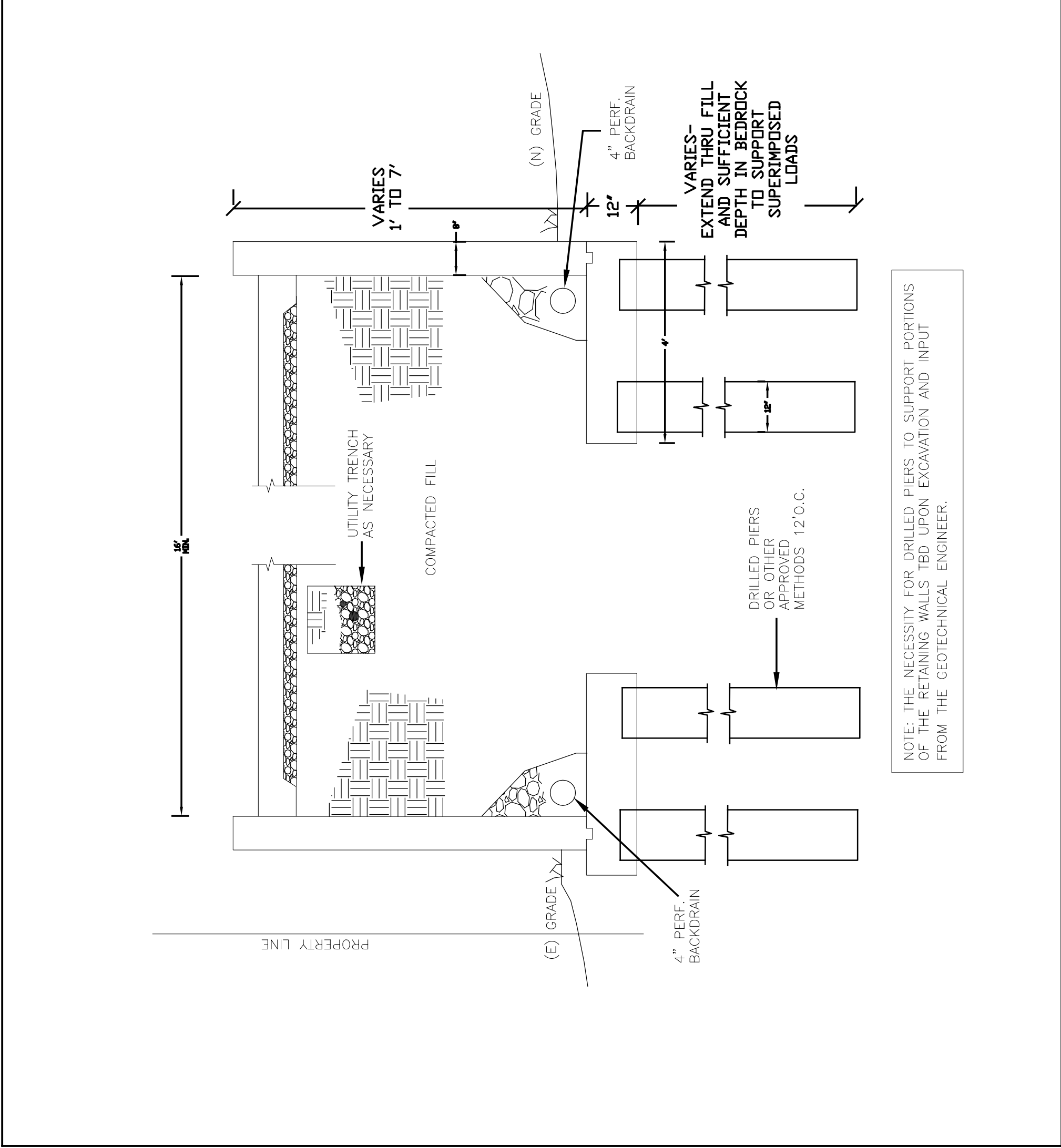
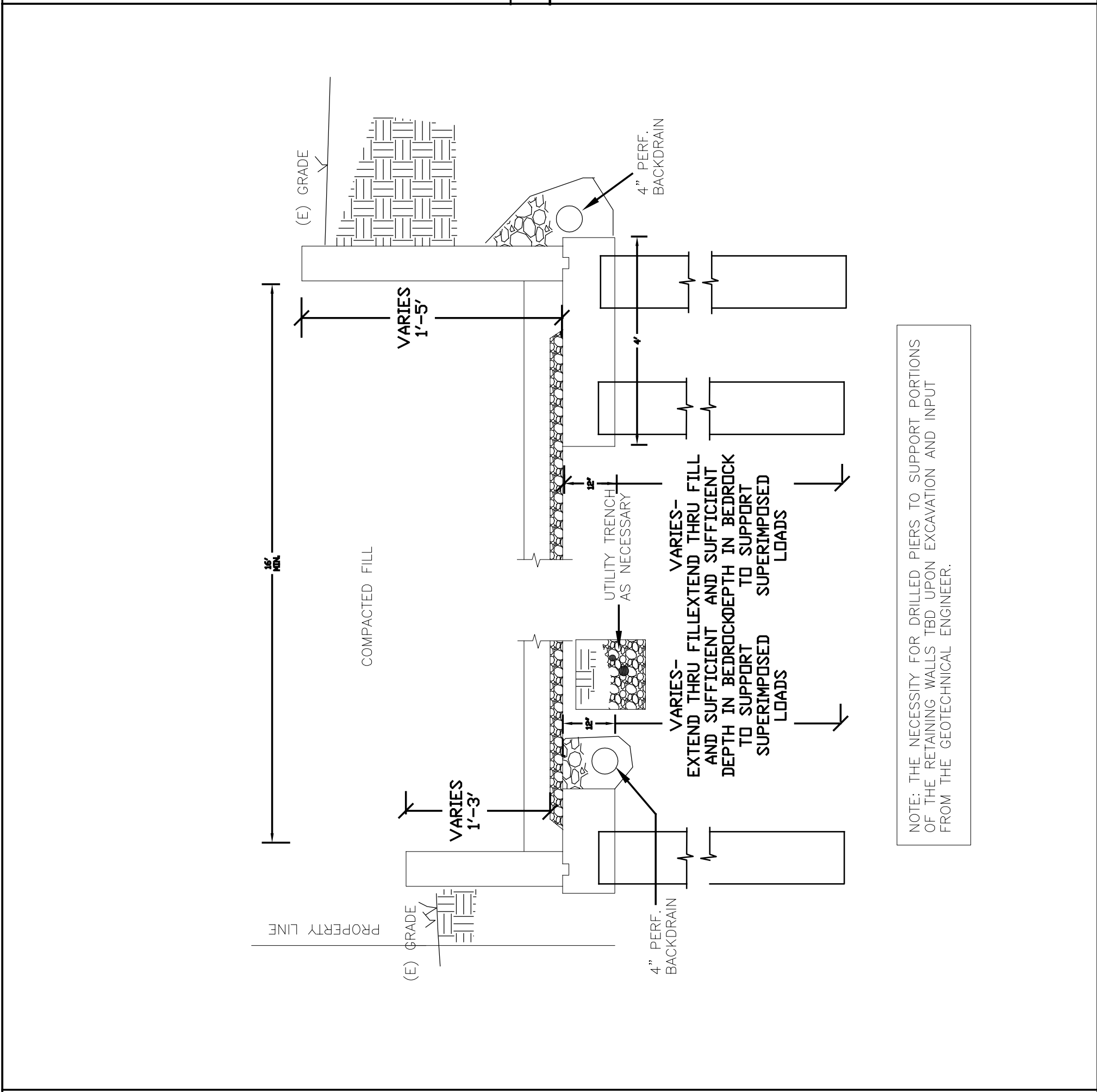
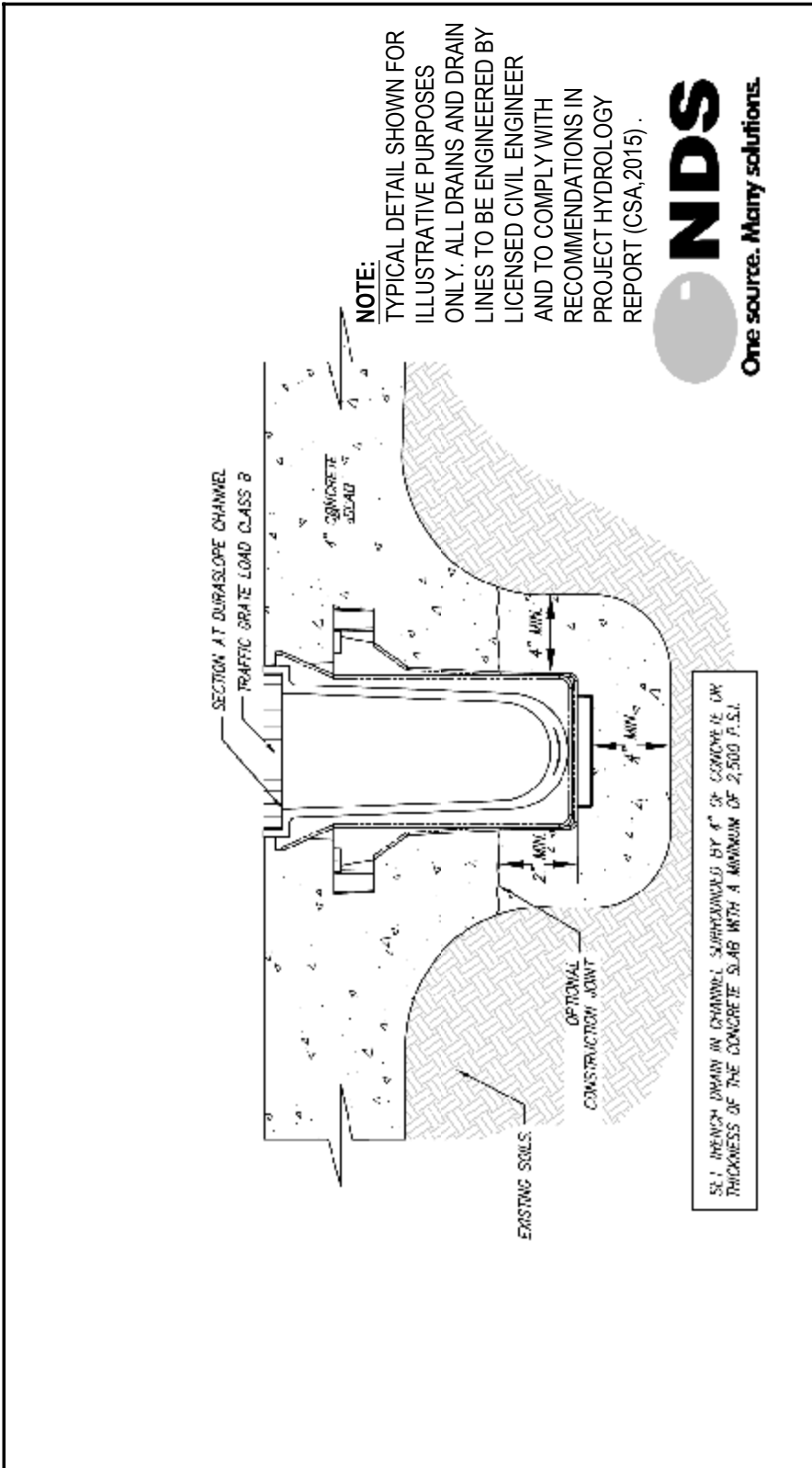
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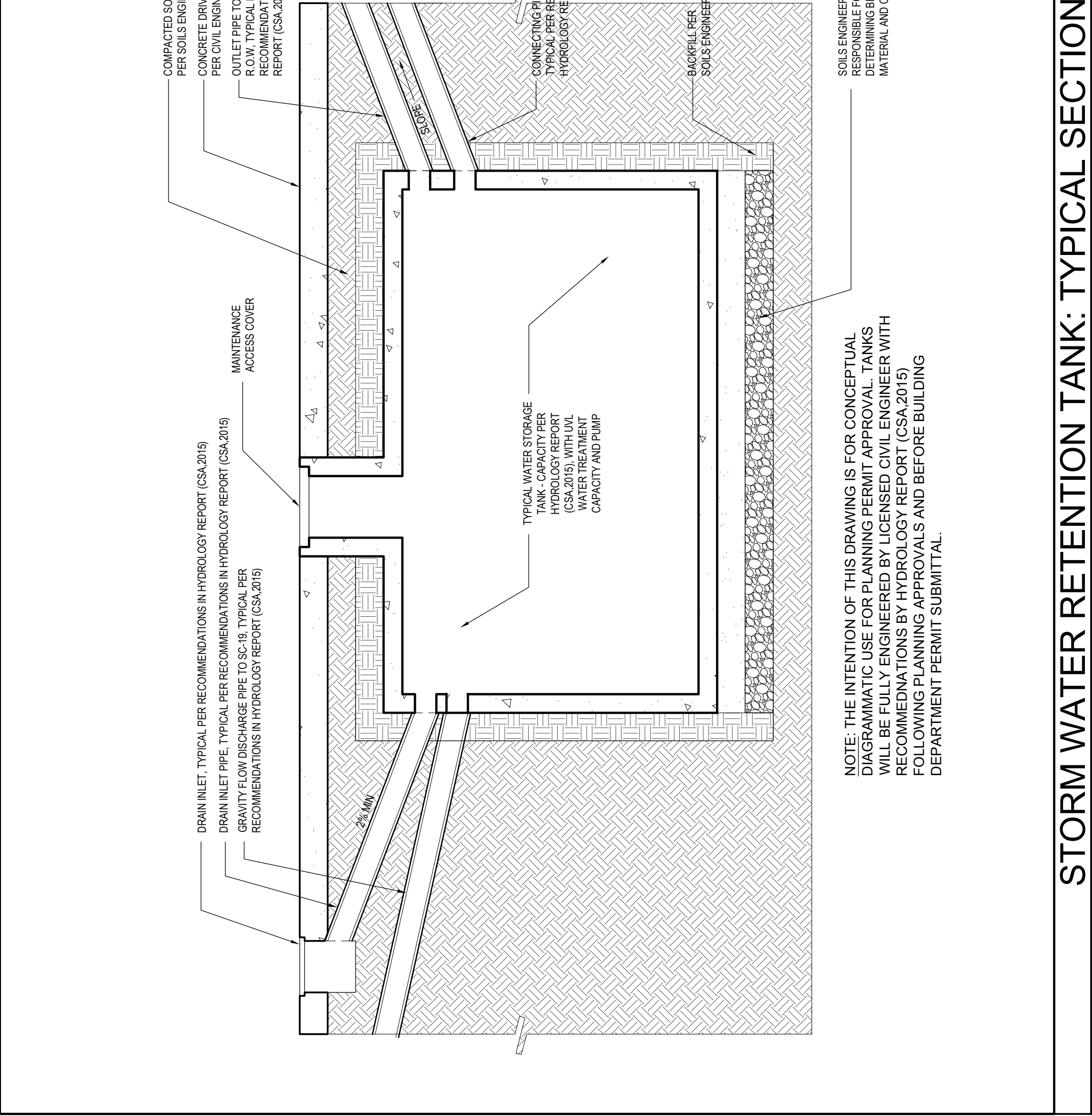
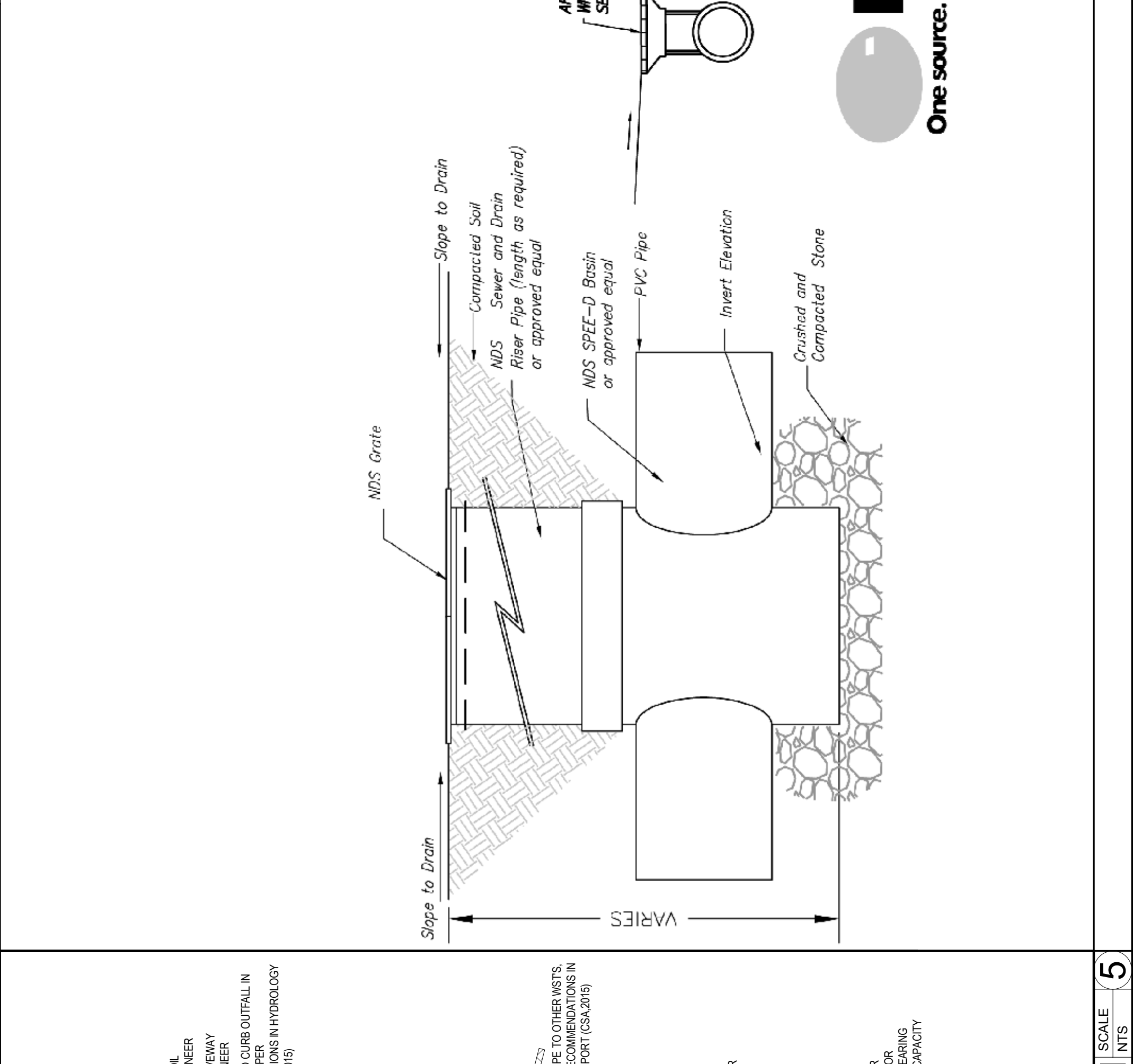
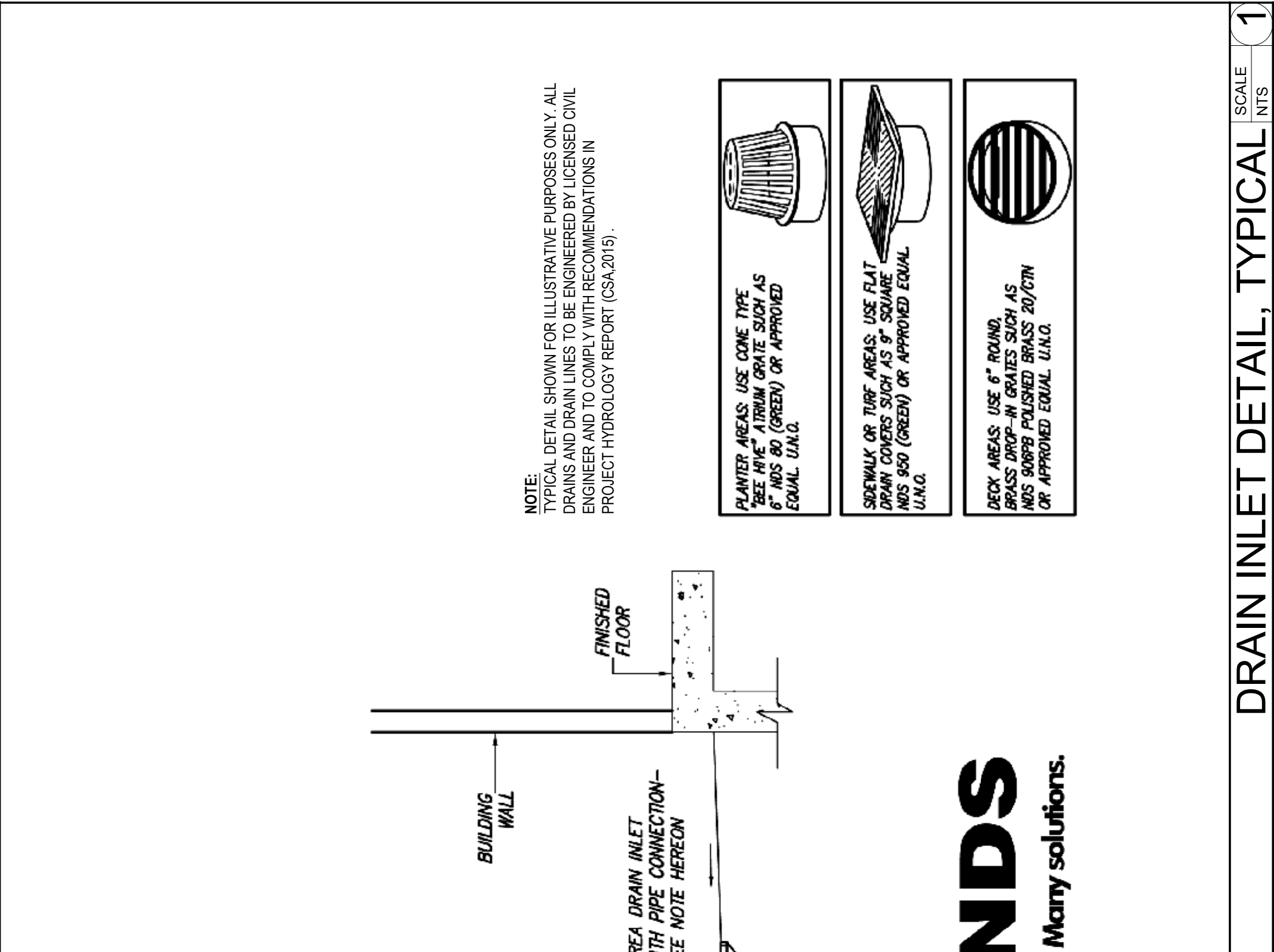


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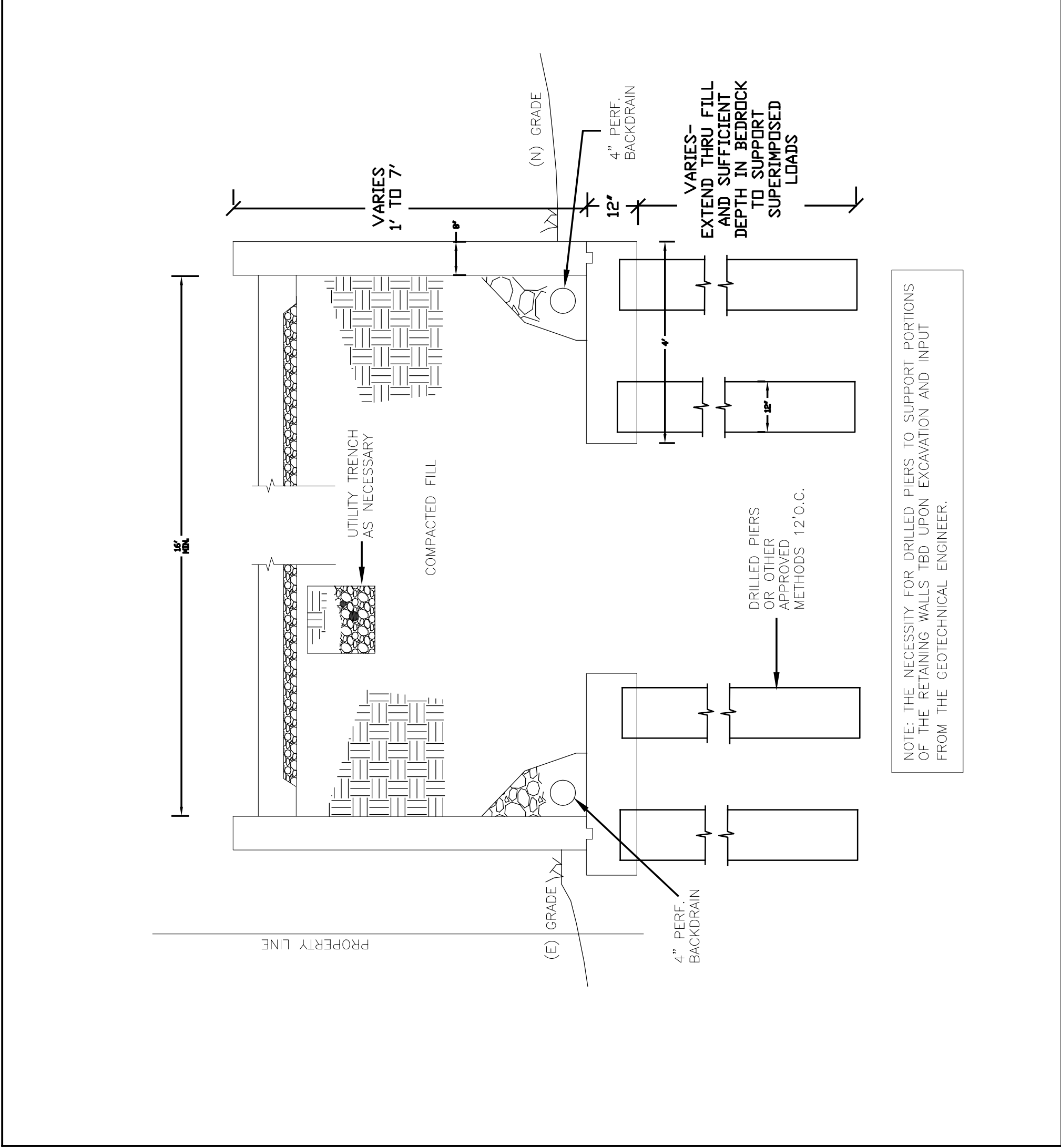
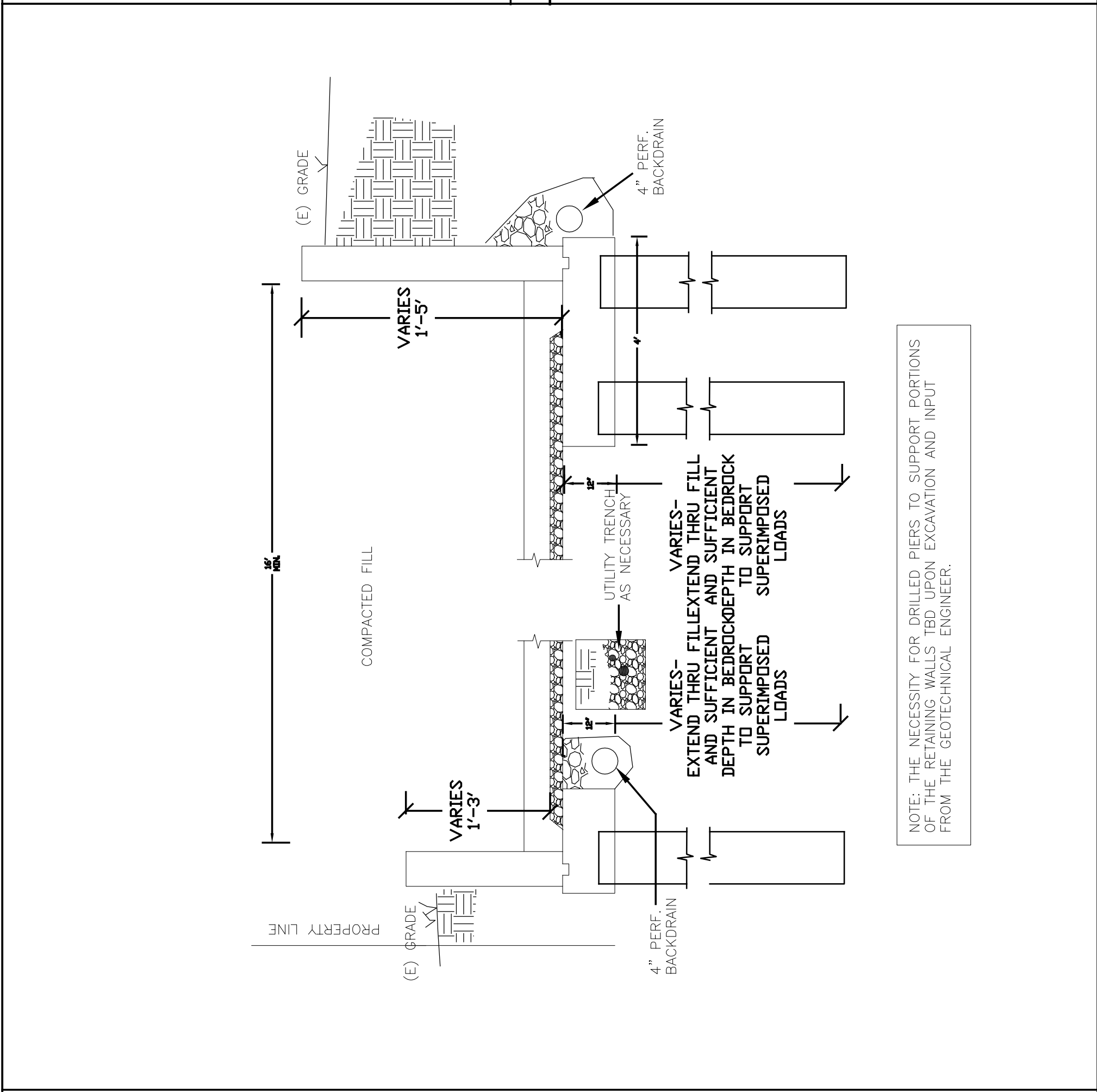
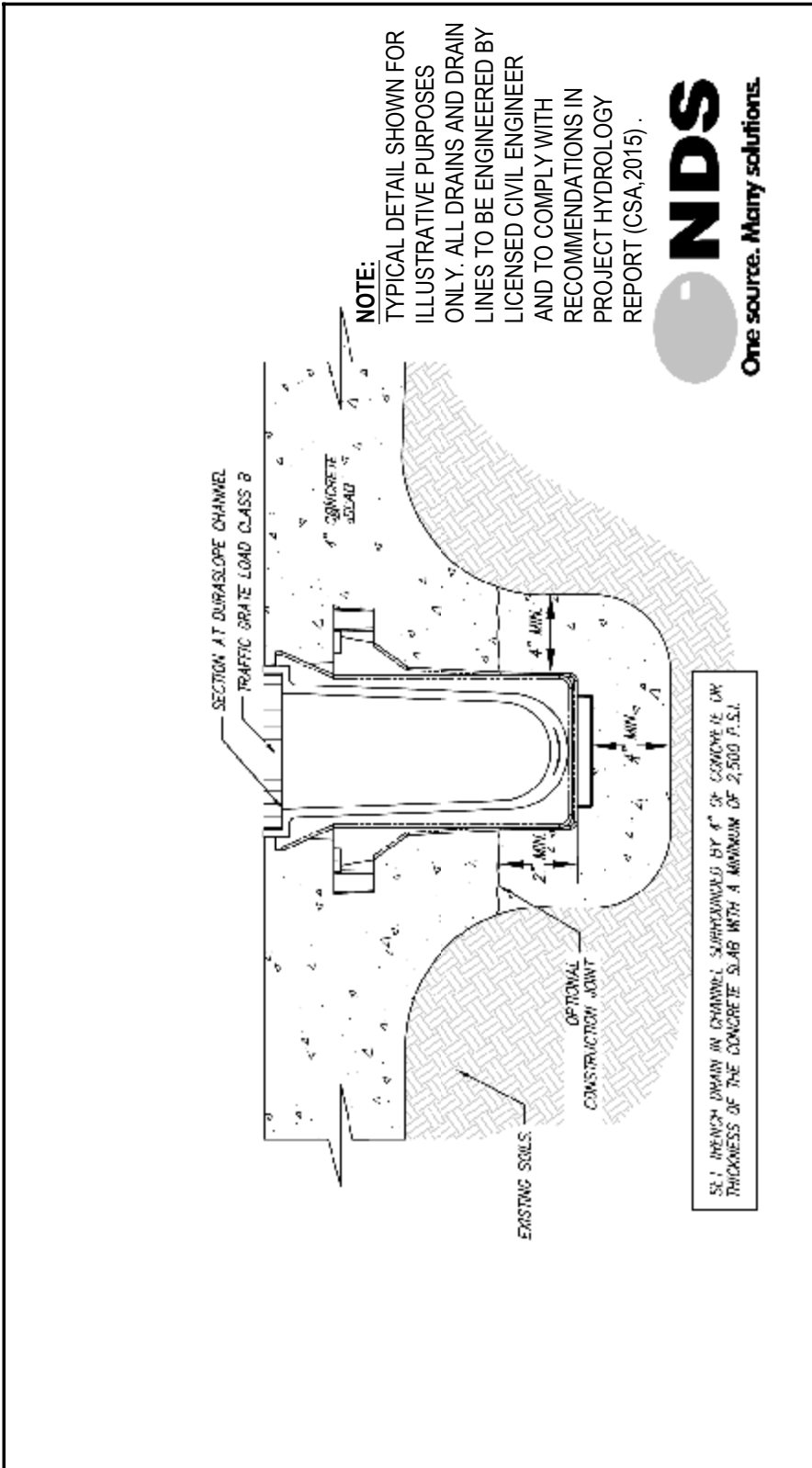
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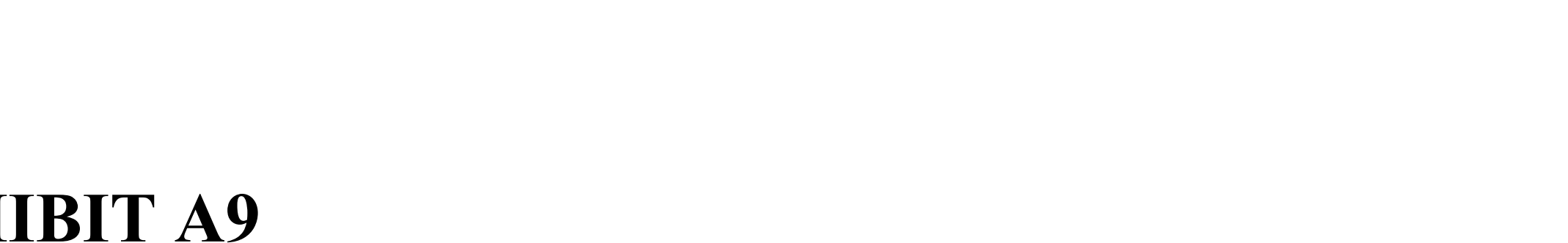
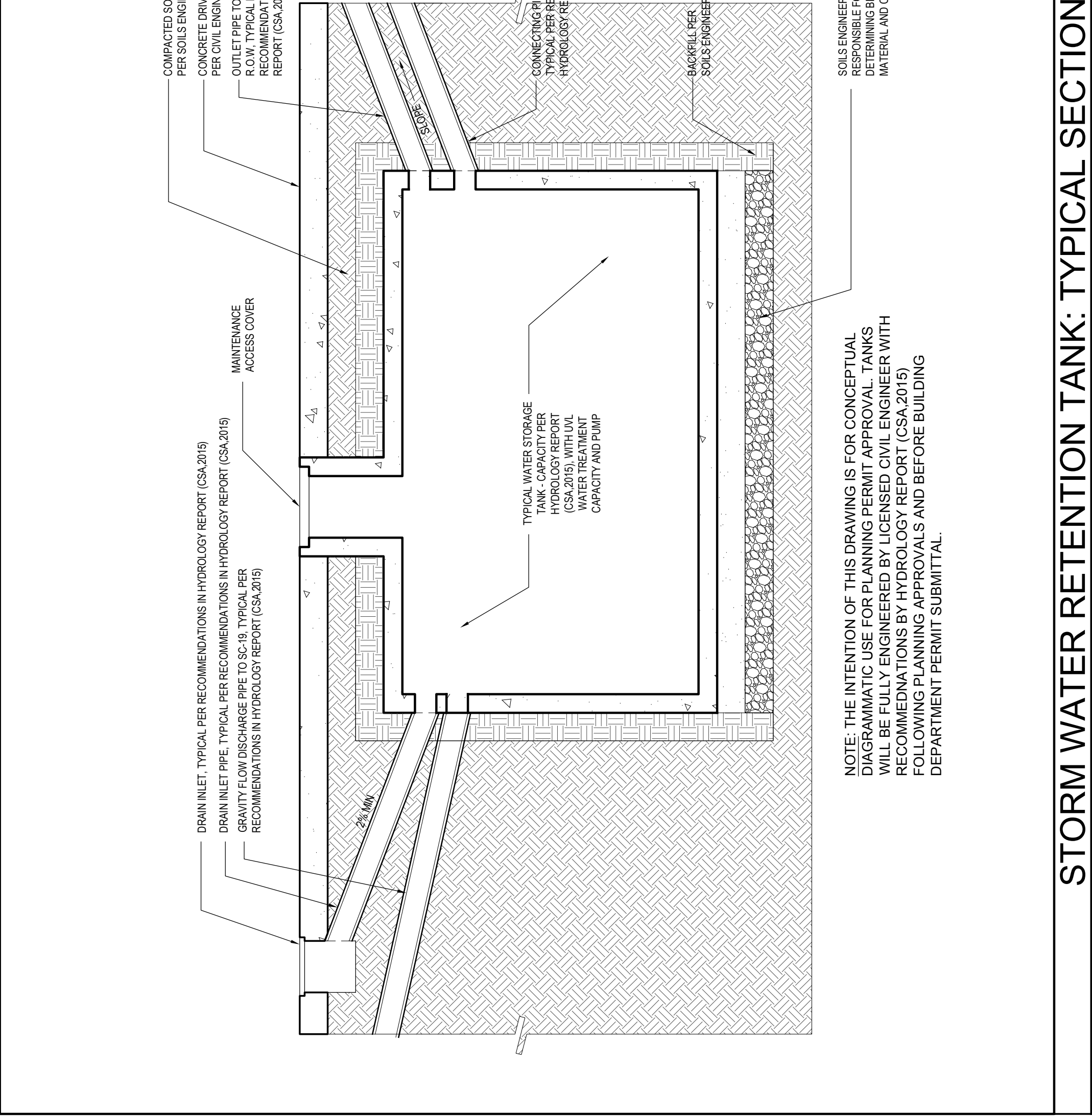
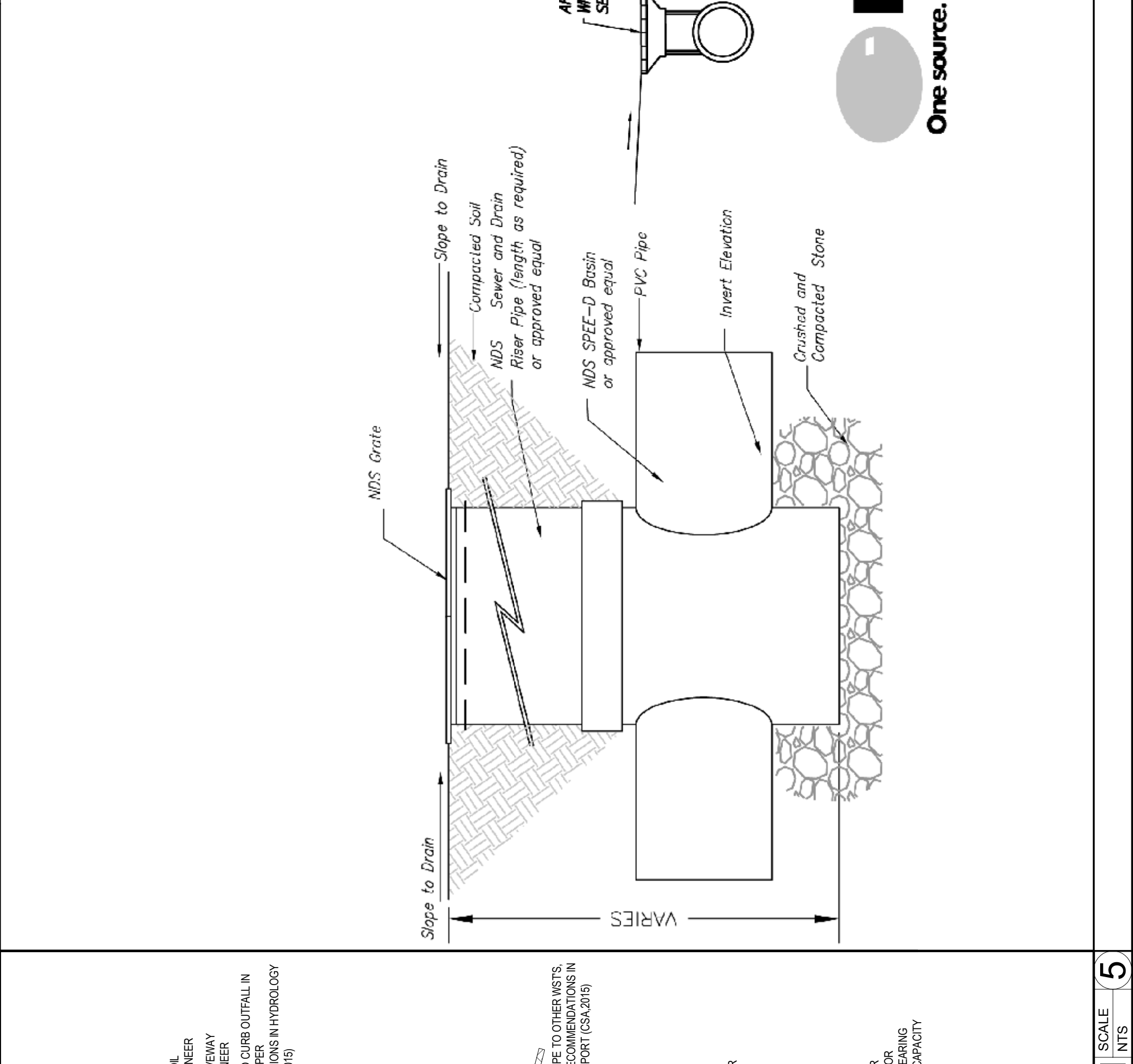
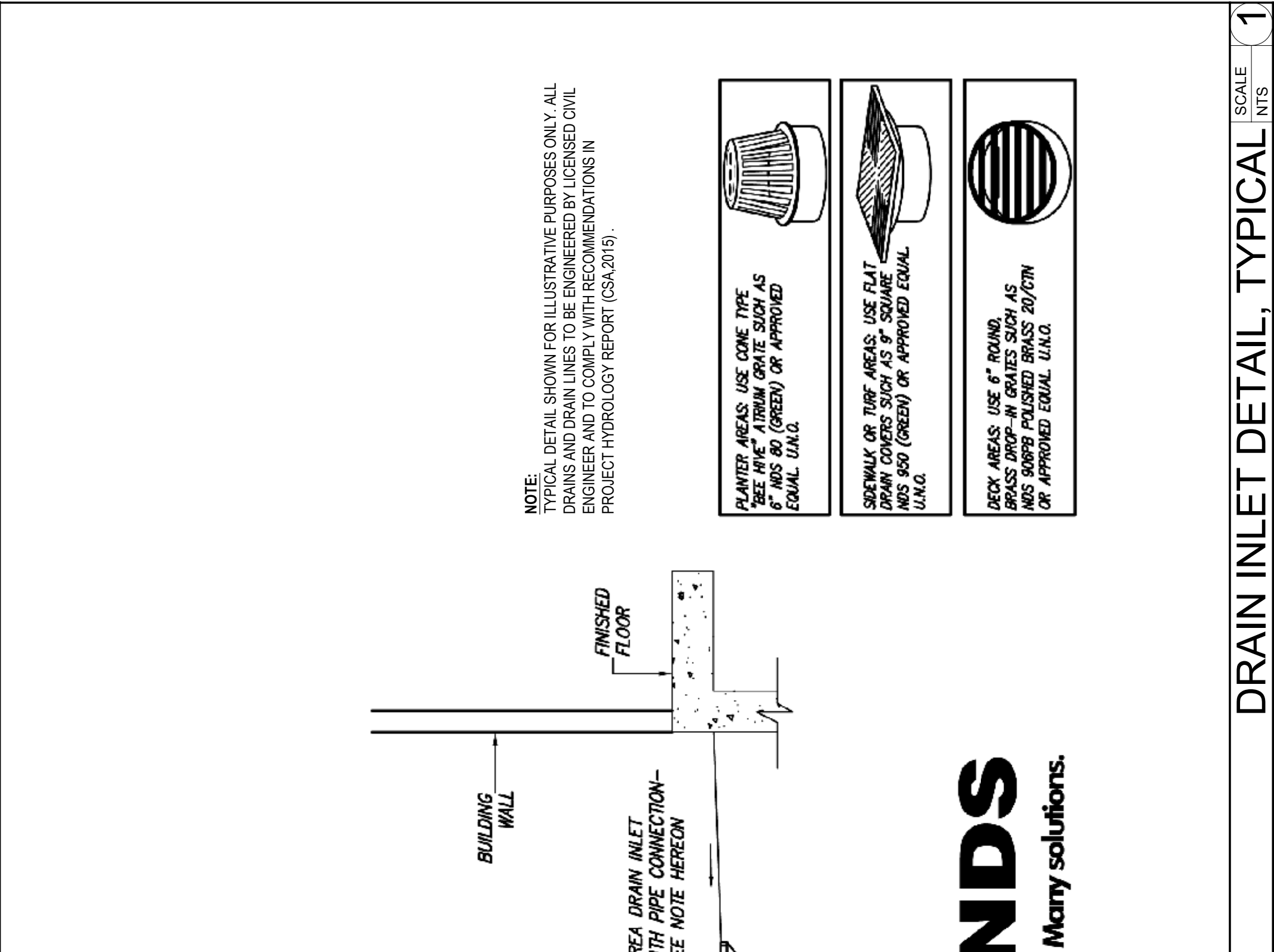


TRENCH DRAIN DETAIL, TYPICAL

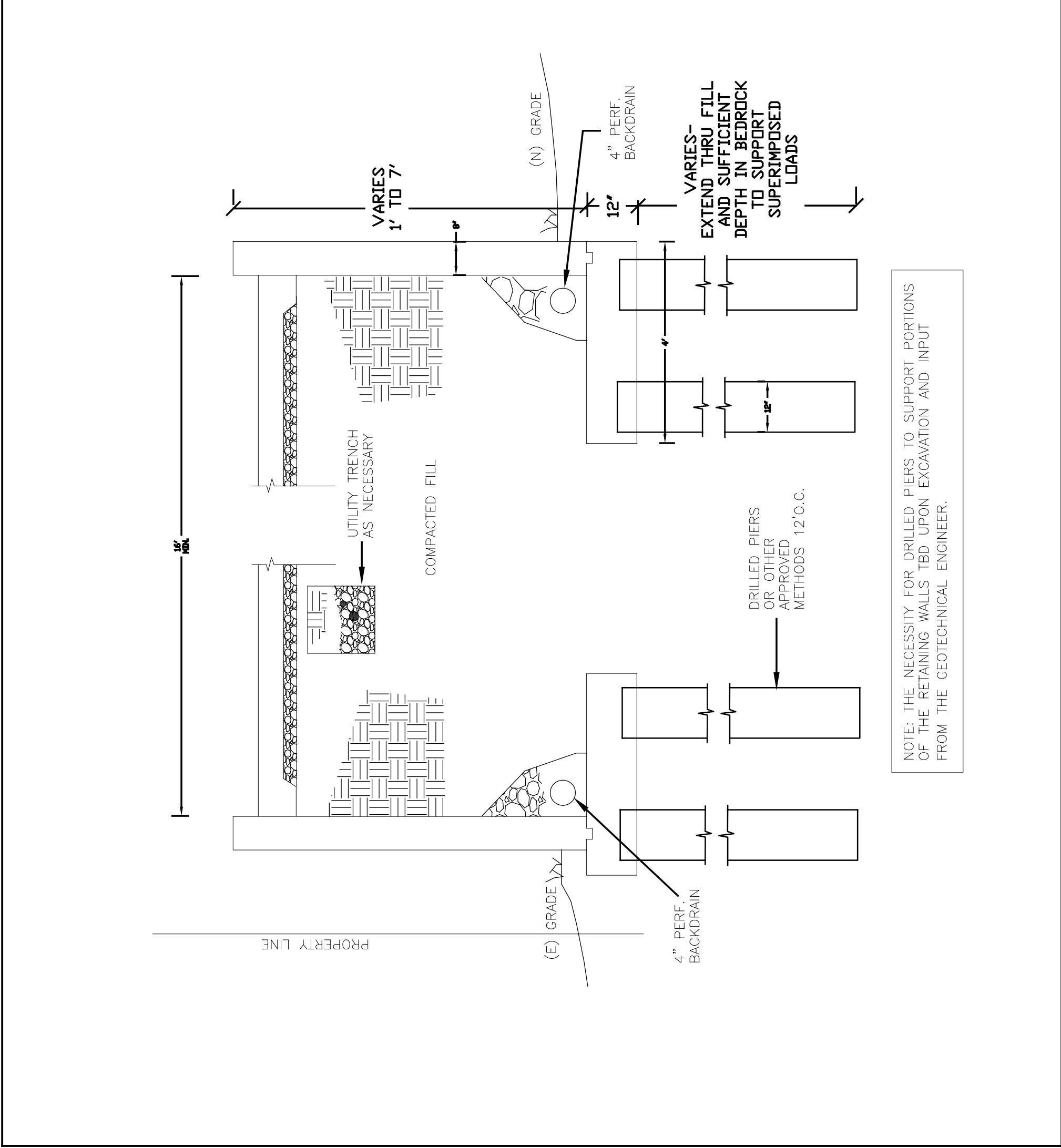
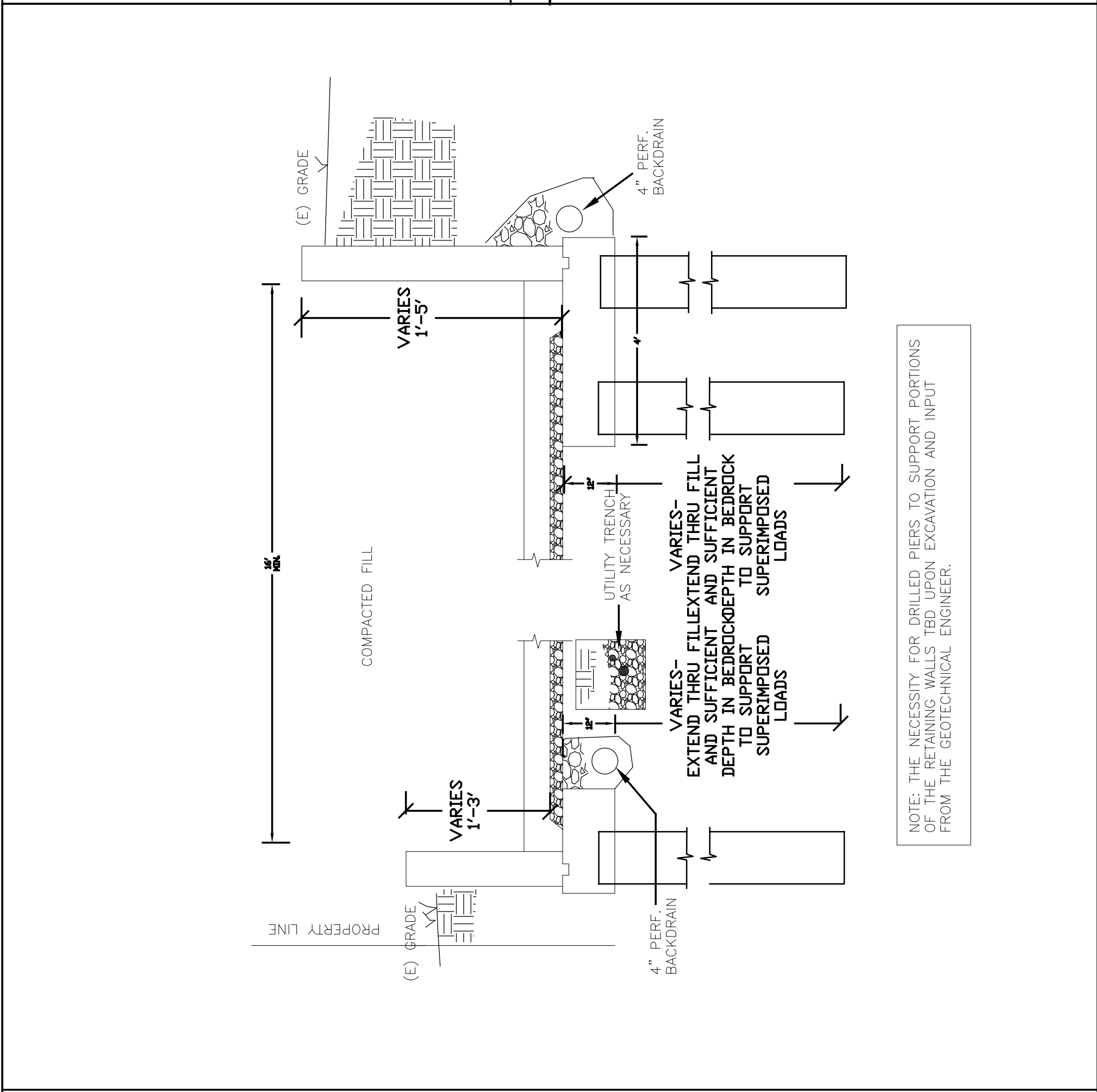
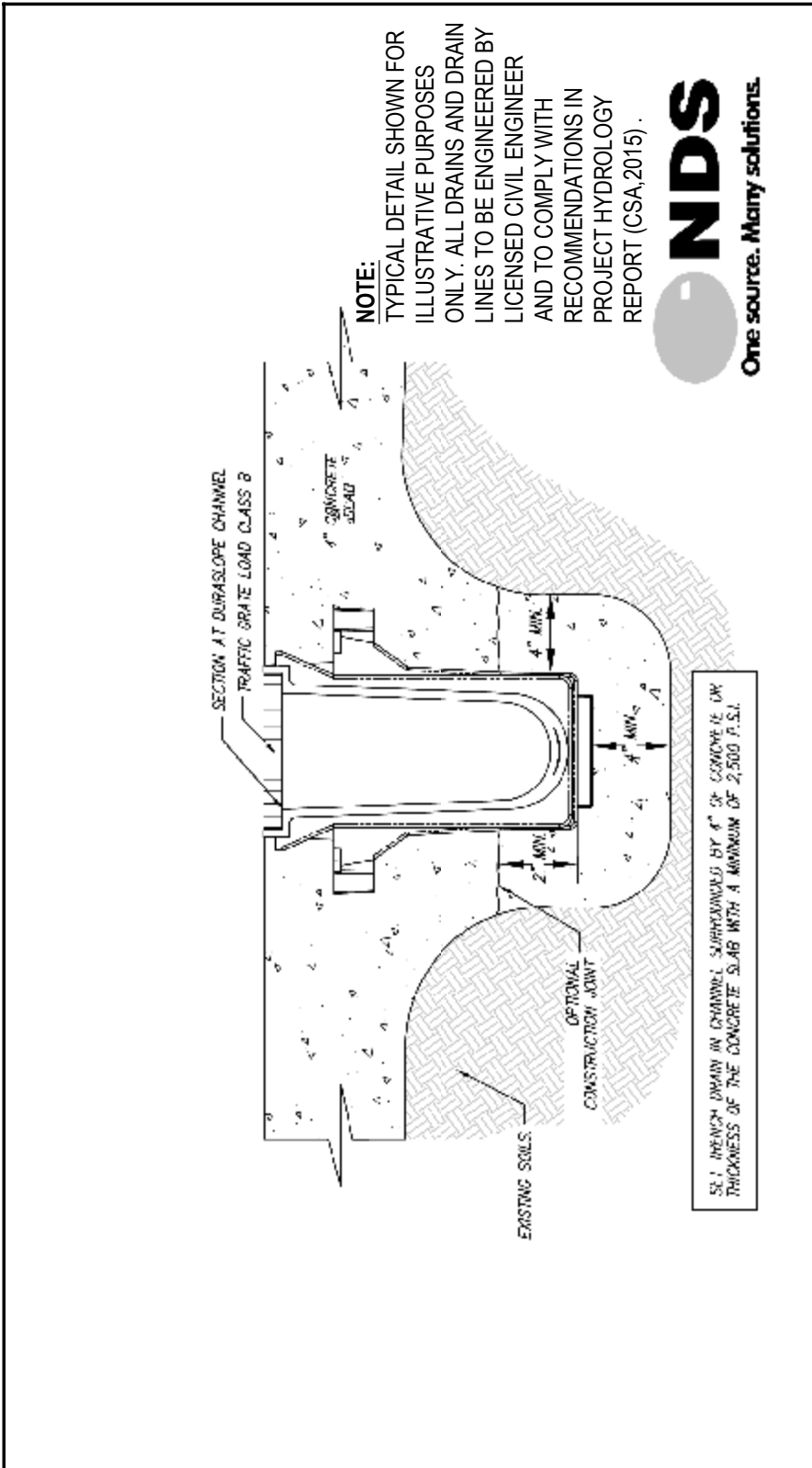
AREA CATCH BASIN DETAIL, TYPICAL

SECTION C: DRIVEWAY IN CUT

SECTION B: DRIVEWAY IN FILL



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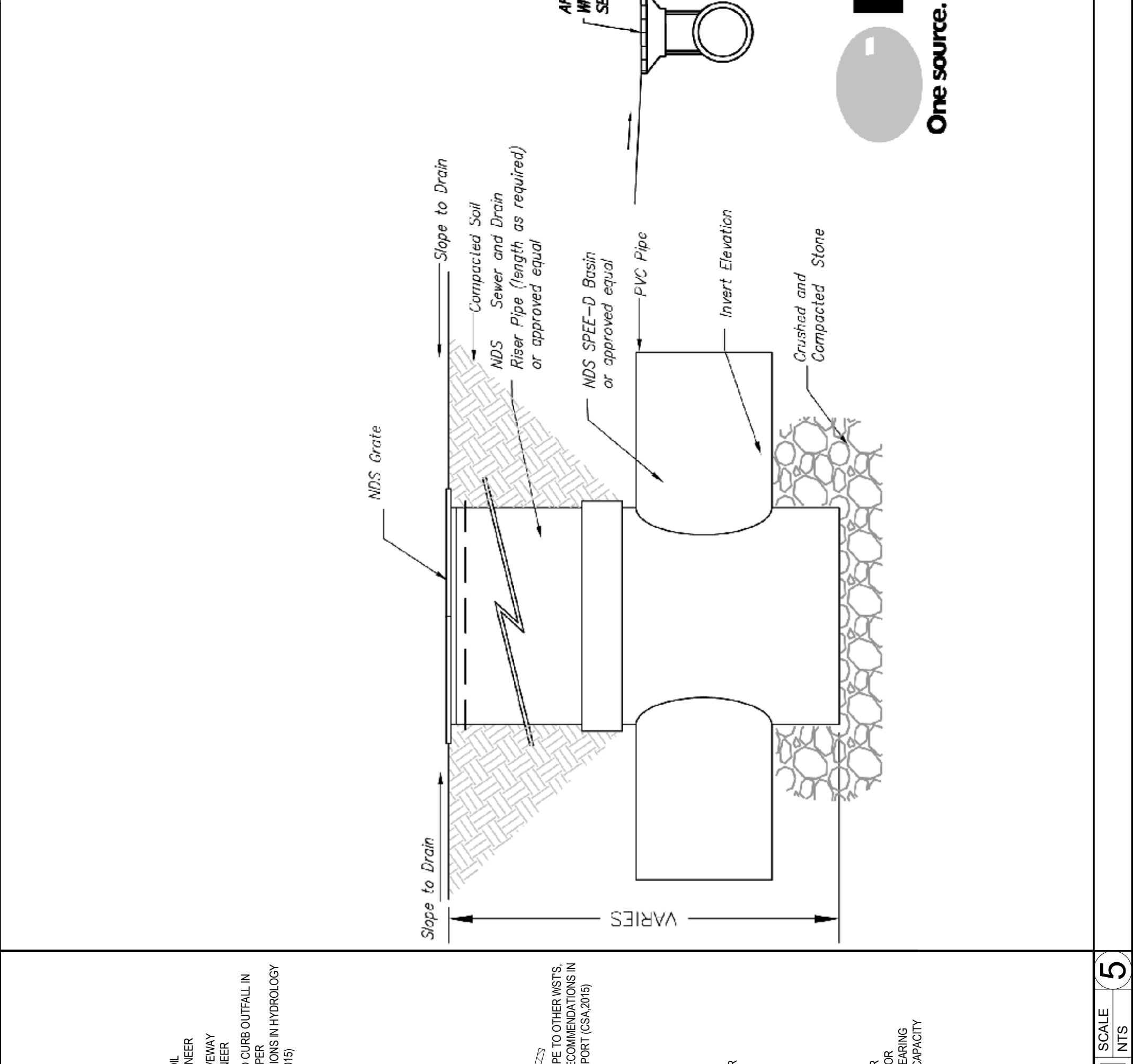
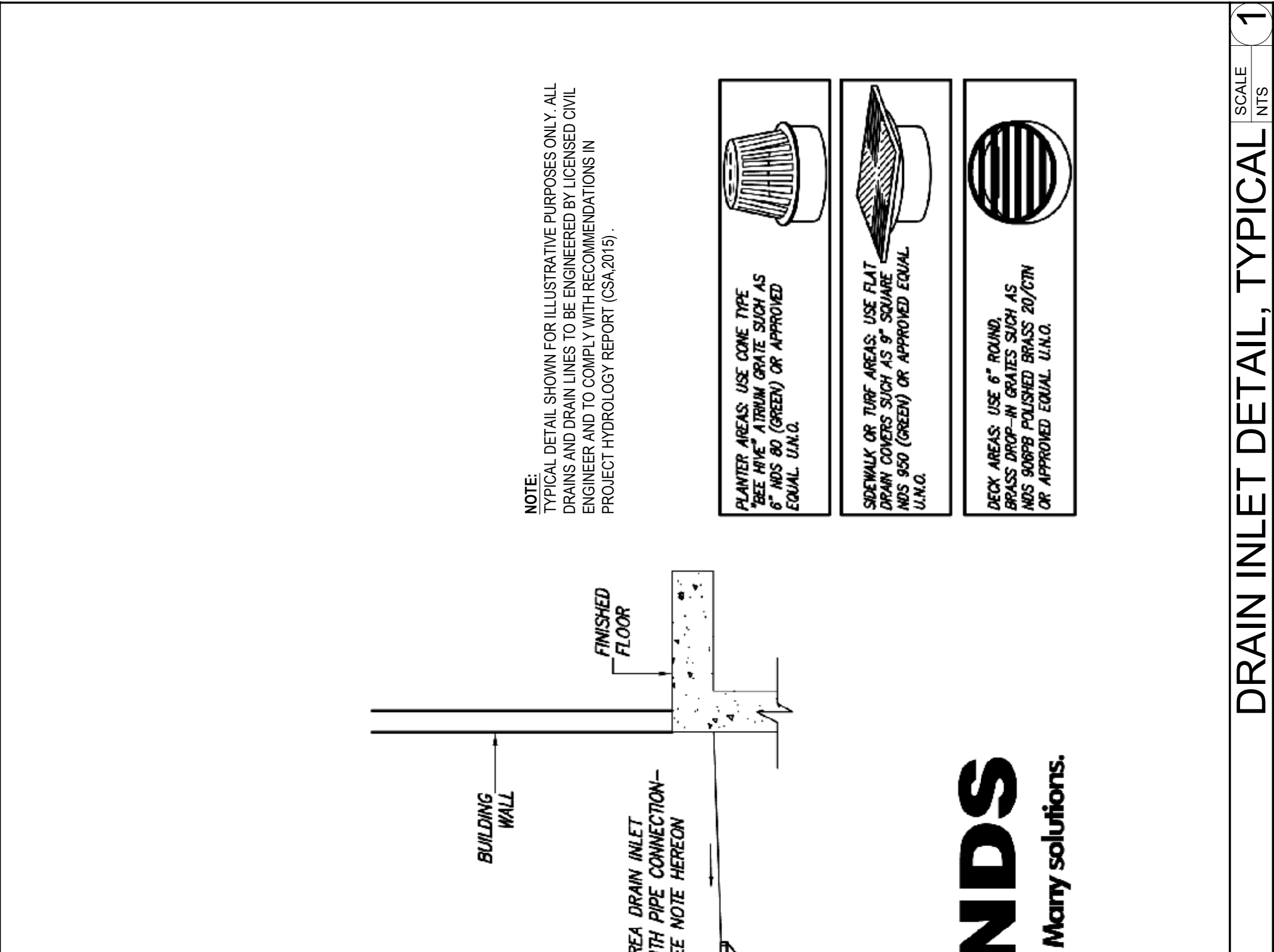


TRENCH DRAIN DETAIL, TYPICAL

AREA CATCH BASIN DETAIL, TYPICAL

SECTION C: DRIVEWAY IN CUT

SECTION B: DRIVEWAY IN FILL



Summary of Analysis Guidelines for Environmental Impact Topics

1. Visual Resources

Issues: Issues associated with visual resources and aesthetics include the potential blockage of important public scenic views, project on-site visual aesthetics and compatibility with the surrounding area, and changes in exterior lighting.

Impact Evaluation Guidelines: Aesthetic quality, whether a project is visually pleasing or unpleasing, may be perceived and valued differently from one person to the next, and depends in part on the context of the environment in which a project is proposed. The significance of visual changes is assessed qualitatively based on consideration of the proposed physical change and project design within the context of the surrounding visual setting. First, the existing visual setting is reviewed to determine whether important existing visual aesthetics are involved, based on consideration of existing views, existing visual aesthetics on and around the site, and existing lighting conditions. Under CEQA, the evaluation of a project's potential impacts to scenic views is focused on views from public (as opposed to private) viewpoints and larger community wide views (those things visible by a larger community, as opposed to select individuals). The importance of existing views is assessed qualitatively based on whether important visual resources such as mountains, skyline trees, or the coastline, can be seen, the extent and scenic quality of the views, whether the views are experienced from public viewpoints, and how many people can see the views. The visual changes associated with the project are then assessed qualitatively to determine whether the project would result in substantial effects associated with important public scenic views, on-site visual aesthetics, and lighting.

Significant visual resources impacts may potentially result from:

- Substantial obstruction of important public or community wide scenic views.
- Substantial degradation of important public or community wide scenic views or the visual quality of the site through extensive grading and changes in topography, removal of substantial amounts of vegetation and trees visible from public areas without adequate landscaping; or substantial loss of important public open space.
- Substantial damage to scenic resources within a state scenic highway (Highway 154). Impacts to local scenic roads should also be considered. These include Highway 101; Cabrillo Blvd between Highway 101 and Castillo Street; Sycamore Canyon Road (144)/Stanwood Drive(192)/Mission Ridge Road (192)/Mountain Drive to the Old Mission on Los Olivos Street), or Shoreline Drive from Castillo Street to the end of Shoreline Park.
- Substantial negative aesthetic effect or incompatibility with surrounding land uses or structures due to project size, massing, scale, density, architecture, signage, or other design features.
- Substantial light and/or glare that poses a hazard, disrupts sensitive wildlife, or substantially affects day or nighttime views.

2. Air Quality

Issues. Air quality issues involve pollutant emissions from vehicle exhaust, stationary sources (e.g. gas stations, boilers, diesel generators, dry cleaners, oil and gas processing facilities, etc.), and minor stationary sources called “area sources” (e.g. residential heating and cooling, fireplaces, etc.) that contribute to smog, particulates and nuisance dust associated with grading and construction processes, and nuisance odors. Stationary sources of air emissions are of particular concern to sensitive receptors, as is construction dust and particulate matter. Sensitive receptors are defined as children, elderly, or ill people that can be more

adversely affected by air quality emissions. Land uses typically associated with sensitive receptors include schools, parks, playgrounds, childcare centers, retirement homes, convalescent homes, hospitals, and clinics.

Smog, or ozone, is formed in the atmosphere through a series of photochemical reactions involving interaction of oxides of nitrogen [NO_x] and reactive organic compounds [ROC] (referred to as ozone precursors) with sunlight over a period of several hours. Primary sources of ozone precursors in the South Coast area are vehicle emissions. Sources of particulate matter (PM₁₀ and PM_{2.5}) include demolition, grading, road dust, agricultural tilling, mineral quarries, and vehicle exhaust.

The City of Santa Barbara is part of the South Coast Air Basin. The City is subject to the National Ambient Air Quality Standards and the California Ambient Air Quality Standards (CAAQS), which are more stringent than the national standards. The CAAQS apply to six pollutants: photochemical ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, particulate matter, and lead. The Santa Barbara County Air Pollution Control District (APCD) provides oversight on compliance with air quality standards and preparation of the County Clean Air Plan.

Santa Barbara County is considered in attainment of the federal eight-hour ozone standard, and in attainment of the state one-hour ozone standard. The County does not meet the state eight-hour ozone standard or the state standard for particulate matter less than ten microns in diameter (PM₁₀); but does meet the federal PM₁₀ standard. The County is in attainment for the federal PM_{2.5} standard and is unclassified for the state PM_{2.5} standard.

The APCD has also issued several notifications and requirements regarding toxic air emissions generated from activities such as gasoline dispensing, dry cleaning, freeways, manufacturing, etc., that may require projects with these components to mitigate or redesign features of the project to avoid excessive health risks. Additionally, APCD requires submittal of an asbestos notification form for each regulated structure that is proposed to be demolished or renovated. The California Air Resources Board (CARB) and APCD also recommend buffers between Highway 101 and new residential developments or other sensitive receptors in order to reduce potential health risks associated with traffic-related air pollutant emissions, particularly diesel particulates. Based on analysis in the certified Final Program EIR (2010) for the Plan Santa Barbara General Plan Update, the City established an interim policy limiting the introduction of new residential construction or sensitive receptor uses within 250 feet of Highway 101 (excluding minor additions or remodels of existing homes or the construction of one new residential unit on vacant property), until CARB implements further statewide phased diesel reduction measures and/or the City otherwise determines a satisfactory reduction of diesel reduction risks citywide or on individual projects. Certain projects also have the potential to create objectionable odors that could create a substantial nuisance to neighboring residential areas or sensitive receptors and should be evaluated in CEQA documents.

Global climate change refers to accelerated changes occurring in average worldwide weather patterns, measurable by factors such as air and ocean temperatures, wind patterns, storms, and precipitation. Climate changes are forecasted to result in increasingly serious effects to human health and safety and the natural environment in coming decades, such as from more extreme weather, sea level rise effects on flooding and coastal erosion, and impacts on air and water quality, habitats and wildlife, and agriculture.

There is substantial evidence that accelerated climate change is due to emissions of carbon dioxide and other heat trapping “greenhouse gases”¹ (GHG) from human activities. Natural processes emit GHG to regulate the earth’s temperature; however, substantial increases in emissions, particularly from fossil fuel combustion for electricity production and vehicle use, have substantially elevated the concentration of these gases in the atmosphere well beyond naturally occurring concentrations.

¹ Greenhouse gases include carbon dioxide, methane, and nitrous oxide, as well as smaller contributions from hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Greenhouse gas emissions are typically measured in metric tons (MT) of carbon dioxide equivalents (CO₂e) based on global warming potential, which allows for totaling the emissions.

Carbon dioxide accounts for 85 percent of greenhouse gas emissions within the United States. California is a substantial contributor of GHG (2nd largest contributor in the U.S. and the 16th largest in the world), with transportation and electricity generation representing the largest sources (41 and 22 percent, respectively). In Santa Barbara, direct sources of greenhouse gas emissions are on-road vehicles, natural gas consumption, and off-road vehicles and equipment. Indirect sources (emissions removed in location or time) are electricity consumption (power generation), landfill decomposition (methane releases), and State Water Project transport (electricity use).

California Assembly Bill 32 (2006 Global Warming Solutions Act) required CARB to create a program to reduce statewide greenhouse gas emissions to 1990 levels by the year 2020. Senate Bill 375 (2008 Sustainable Communities and Climate Protection Act) required regional coordination of transportation and land use planning throughout the State to reduce vehicle GHG emissions. CARB established targets for Santa Barbara County to not exceed 2005 per capita vehicle emissions in the years 2020 and 2035. State Senate Bill 97 (enacted in 2007 and amended in 2010) required that project environmental reviews include analysis of greenhouse gas impacts and mitigation, and established that public agencies may provide for a communitywide greenhouse gas emissions mitigation program through an adopted climate action plan.

The City of Santa Barbara Climate Action Plan was adopted in September 2012. Past, present, and forecasted future citywide greenhouse gas emissions were analyzed in the Plan and associated Addendum to the 2011 Final Program EIR for the General Plan Update in comparison to the State and City greenhouse gas emissions targets (2020 total emissions at 1990 level; 2020 and 2035 per capita vehicle emissions at 2005 level). The analysis demonstrates that citywide emissions are decreasing. With continued implementation of existing State and City legislative measures, including measures implemented by new development projects, citywide emissions associated with growth under the General Plan would meet and surpass these State and City emissions targets. Additional Climate Action Plan measures would further reduce citywide emissions. The City Climate Action Plan constitutes a citywide mitigation program for greenhouse gas emissions in accordance with SB 97.

Impact Evaluation Guidelines: A project may create a significant air quality impact from the following:

- Exceeding an APCD pollutant threshold; inconsistency with District regulations; or exceeding population forecasts in the adopted County Clean Air Plan.
- Exposing sensitive receptors, such as children, the elderly or sick people, to substantial pollutant concentrations.
- Substantial unmitigated nuisance dust during earthwork or construction operations.
- Creation of nuisance odors inconsistent with APCD regulations.

Long-Term (Operational) Impact Guidelines: The City of Santa Barbara uses the APCD thresholds of significance for evaluating air quality impacts. The APCD has determined that a proposed project will not have a significant air quality impact on the environment if operation of the project will:

- Emit (from all project sources, both stationary and mobile) less than 240 pounds per day for ROC and NO_x, and 80 pounds per day for PM₁₀;
- Emit less than 25 pounds per day of ROC or NO_x from motor vehicle trips only;
- Not cause a violation of any California or National Ambient Air Quality Standard (except ozone);
- Not exceed the APCD health risks public notification thresholds adopted by the APCD Board; and
- Be consistent with the adopted federal and state air quality plans for Santa Barbara.

Substantial long-term project emissions could potentially stem from stationary sources which may require permits from the APCD and from motor vehicles associated with the project and from mobile sources. Examples of stationary emission sources that require permits from APCD include gas stations, auto body

shops, diesel generators, boilers and large water heaters, dry cleaners, oil and gas production and processing facilities, and wastewater treatment facilities.

Short-Term (Construction) Impacts Guidelines: Projects involving grading, paving, construction, and landscaping activities may cause localized nuisance dust impacts and increased particulate matter (PM₁₀). Substantial dust-related impacts may be potentially significant, but are generally considered mitigable with the application of standard dust control mitigation measures. Standard dust mitigation measures are applied to projects with either significant or less than significant effects.

Exhaust from construction equipment also contributes to air pollution. Quantitative thresholds of significance are not currently in place for short-term or construction emissions for non-stationary sources. However, APCD uses the threshold for stationary sources as a guideline for determining the impacts of construction emissions for non-stationary sources. The stationary source threshold states that a project's combined emissions from all construction equipment cannot exceed 25 tons of any pollutant except carbon monoxide within a 12-month period. Standard equipment exhaust mitigation measures are recommended by APCD for projects with either significant or less than significant effects.

Cumulative Impacts and Consistency with Clean Air Plan: If the project-specific impact exceeds the ozone precursor significance threshold, it is also considered to have a considerable contribution to cumulative impacts. When a project is not accounted for in the most recent Clean Air Plan growth projections, then the project's impact may also be considered to have a considerable contribution to cumulative air quality impacts. The Santa Barbara County Association of Governments and Air Resources Board on-road emissions forecasts are used as a basis for vehicle emission forecasting. If a project provides for increased population growth beyond that forecasted in the most recently adopted Clean Air Plan, or if the project does not incorporate appropriate air quality mitigation and control measures, or is inconsistent with APCD rules and regulations, then the project may be found inconsistent with the Clean Air Plan and may have a significant impact on air quality.

Global Climate Change: In accordance with Appendix G of the CEQA Guidelines, a project may have a significant impact related to global climate change if it would generate substantial greenhouse gas emissions either directly or indirectly, or would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases.

Based on the analysis within the City Climate Action Plan and the General Plan Program EIR Addendum, projects within the growth assumptions of the 2030 General Plan and that meet applicable City regulations for greenhouse gas emission reductions:

- (1) Would be consistent with the City Climate Action Plan and associated policies and regulations for reducing greenhouse gas emissions;
- (2) Would be within the citywide greenhouse gas impact assessment in the Climate Action Plan and associated General Plan Program EIR Addendum, which found that total citywide greenhouse gas emissions and per capita vehicle emissions would meet State and City reduction targets and would not constitute a significant environmental impact; and
- (3) Would be within the City Council Climate Action Plan adoption finding that no significant greenhouse gas impacts would result from General Plan build out of the City.

3. Biological Resources

Issues: Biological resources issues involve the potential for a project to substantially affect biologically-important natural vegetation and wildlife, particularly species that are protected as rare, threatened, or endangered by federal or state wildlife agencies, and their habitats.

Impact Evaluation Guidelines: Existing native wildlife and vegetation on a project site are assessed to identify whether they constitute important biological resources, based on the types, amounts, and quality of

the resources within the context of the larger ecological community. If important or sensitive biological resources exist, project effects on the resources are qualitatively evaluated to determine whether the project would substantially affect these important biological resources. Significant biological resource impacts may potentially result from substantial disturbance to important wildlife and vegetation in the following ways:

- Elimination, substantial reduction or disruption of important natural vegetative communities, wildlife habitat, migration corridors, or habitats supporting sensitive species such as oak woodland, coastal strand, riparian, and wetlands.
- Substantial effect on a protected plant or animal species listed or otherwise identified or protected as endangered, threatened or rare.
- Substantial loss or damage to biologically important native trees such as oak or sycamore trees (note that, if applicable, historic or landmark trees are discussed in Section 4. Cultural Resources, and other trees are discussed in Section 1. Visual Resources).

4. Cultural Resources

Issues: Archaeological resources are subsurface deposits dating from Prehistoric or Historical time periods. Native American culture appeared along the channel coast over 10,000 years ago, and numerous villages of the Barbareño Chumash flourished in coastal plains now encompassed by the City. Spanish exploration and eventual settlements in Santa Barbara occurred in the 1500's through 1700's. In the mid-1800's, the City began its transition from Mexican village to American city, and in the late 1800's through early 1900's experienced intensive urbanization. Historic resources are aboveground structures and sites from historical time periods with historic, architectural, or other cultural importance. The City's built environment has a rich cultural heritage with a variety of architectural styles, including the Spanish Colonial Revival style emphasized in the rebuilding of Santa Barbara's downtown following a destructive 1925 earthquake.

Impact Evaluation Guidelines: Archaeological and historical impacts are evaluated qualitatively by archeologists and historians. First, existing conditions on a site are assessed to identify whether important or unique archaeological or historical resources exist, based on criteria specified in the State CEQA *Guidelines* and City Master Environmental Assessment *Guidelines for Archaeological Resources and Historical Structures and Sites*, summarized as follows:

- Contains information needed to answer important scientific research questions and there exists a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with an important prehistoric or historic event or person.

If important archaeological or historic resources exist on the site, project changes are evaluated to determine whether they would substantially affect these important resources.

5. Geology and Soils - Discussion

Issues: Geophysical impacts involve geologic and soil conditions, and their potential to create physical hazards affecting persons or property; or substantial changes to the physical condition of the site. Included are earthquake-related conditions such as fault rupture, ground shaking, liquefaction (a condition in which saturated soil loses shear strength during earthquake shaking), or seismic waves; unstable soil or slope conditions, such as landslides, subsidence (the downward shifting of the Earth's surface; can result in sinkholes), expansive or compressible/collapsible soils, or erosion; and extensive grading or topographic changes.

Impact Evaluation Guidelines: Potentially significant geophysical impacts may result from:

- Exposure of people or structures to risk of loss, injury, or death involving unstable earth conditions due to: seismic conditions (such as earthquake faulting, ground shaking, liquefaction, or seismic waves); landslides; sea cliff retreat; or expansive soils.
- Exposure to or creation of unstable earth conditions due to geologic or soil conditions, such as landslides, settlement, or expansive, collapsible/compressible, or expansive soils.
- Substantial erosion of soils.
- Placement of a septic system in an area with soils not capable of adequately supporting disposal of wastewater or where waste water could potentially cause unstable conditions or water quality problems.

6. Hazards and Hazardous Materials

Issues: Hazardous materials issues involve the potential for public health or safety impacts from exposure of persons or the environment to hazardous materials or risk of accidents involving combustible or toxic substances.

Impact Evaluation Guidelines: Significant impacts may result from the following:

- Siting of incompatible projects in close proximity to existing sources of safety risk, such as pipelines, industrial processes, railroads, airports, etc.
- Exposure of project occupants or construction workers to unremediated soil or groundwater contamination.
- Exposure of persons or the environment to hazardous substances due to improper use, storage, or disposal of hazardous materials.
- Physical interference with an emergency evacuation or response plan.
- Siting of development in a high fire hazard areas or beyond adequate emergency response time, with inadequate access or water pressure, or otherwise in a manner that creates a fire hazard.

Emergency access is discussed in the Section 9. Transportation. Toxic air contaminants are discussed in Section 2. Air Quality.

7. Noise

Issues: Noise issues are associated with siting of a new noise-sensitive land use in an area subject to high ambient background noise levels, siting of a noise-generating land use next to existing noise-sensitive land uses, and/or short-term construction-related noise. Similarly construction techniques such as pile driving and blasting and land uses such as the railroad can present issues of ground borne vibration. If ground borne vibration is excessive, it can impact the integrity of structures and can affect sensitive land uses.

The primary source of ambient noise in the City is vehicle traffic noise. The City Master Environmental Assessment (MEA) Noise Contour Map identifies average ambient noise levels within the City.

Ambient noise levels are determined as averaged 24-hour weighted levels, using the Day-Night Noise Level (L_{dn}) or Community Noise Equivalence Level (CNEL) measurement scales. The L_{dn} averages the varying sound levels occurring over the 24-hour day and gives a 10- decibel penalty to noises occurring between the hours of 10:00 p.m. and 7:00 a.m. to take into account the greater annoyance of intrusive noise levels during nighttime hours. Since L_{dn} is a 24-hour average noise level, an area could have sporadic loud noise levels above 60 dB(A) which average out over the 24-hour period. CNEL is similar to L_{dn} but includes a separate 5 dB(A) penalty for noise occurring between the hours of 7:00 p.m. and 10:00 p.m. CNEL and L_{dn}

values usually agree with one another within 1 dB(A).

The Equivalent Noise Level (L_{eq}) is a single noise level, which, if held constant during the measurement time period, would represent the same total energy as a fluctuating noise. L_{eq} values are commonly expressed for periods of one hour, but longer or shorter time periods may be specified. In general, a change in noise level of less than three decibels is not audible. A doubling of the distance from a noise source will generally equate to a change in decibel level of six decibels.

Guidance for appropriate long-term background noise levels for various land uses are established in the City General Plan Noise Element Land Use Compatibility Guidelines. Building codes also establish maximum average ambient noise levels for the interiors of structures.

High construction noise levels occur with the use of heavy equipment such as scrapers, rollers, graders, trenchers and large trucks for demolition, grading, and construction. Equipment noise levels can vary substantially through a construction period, and depend on the type of equipment, number of pieces operating, and equipment maintenance. Construction equipment generates noise levels of more than 80 or 90 dB(A) at a distance of 50 feet, and the shorter impulsive noises from other construction equipment (such as pile drivers and drills) can be even higher, up to and exceeding 100 dB(A). Noise during construction is generally intermittent and sporadic, and after completion of the initial demolition, grading, and site preparation activities, tends to be quieter.

The Noise Ordinance (Chapter 9.16 of the Santa Barbara Municipal Code) governs short-term or periodic noise, such as construction noise, operation of motorized equipment or amplified sound, or other sources of nuisance noise. The ordinance establishes limitations on hours of construction and motorized equipment operations, and provides criteria for defining nuisance noise in general.

Aircraft traffic also creates intermittent higher noise levels and is a major source for noise in the communities surrounding the Santa Barbara Airport. The Airport is located outside of the continuous boundary of the City, and areas affected by aircraft noise include several neighborhoods within the City of Goleta, UCSB, and unincorporated areas of the County. The Santa Barbara Airport's Noise Compatibility Program and the Airport Land Use Plan provide noise abatement procedures and policies for the airport to minimize noise; guidelines for placement of noise sensitive land uses near the airport, and mitigation measures to prevent impacts to residential areas from airport noise.

Impact Evaluation Guidelines: A significant noise impact may result from:

1. Substantial noise and/or vibration from grading and construction activity in close proximity to noise-sensitive receptors for an extensive duration; or
2. Siting of a project such that persons would be subject to long-term ambient noise levels in excess of the Noise Element land use compatibility guidelines as follows. The guidelines include maximum interior and exterior noise levels.
 - a. Interior noise levels are of primary importance for residences due to the health concerns associated with continued exposure to high interior noises. Projects not meeting interior noise levels would have significant noise impacts.
 - b. For exterior noise levels, there are two levels of noise:
 - ii. "Clearly unacceptable" exterior levels are those levels above which it would be prohibitive, even with mitigation, to achieve the maximum interior noise levels, and the outdoor environment would be intolerable for the assigned use. Projects exceeding the maximum "clearly unacceptable" noise levels would have significant noise impacts.
 - iii. "Normally unacceptable" noise levels are those levels which it is clear that with standard construction techniques maximum interior noise levels will be met and there will be little interference with the land use. Projects below the maximum "normally unacceptable" noise

levels would have less than significant noise impacts.

- Projects with exterior noise levels exceeding the “normally acceptable” level and below the maximum “clearly unacceptable” level are evaluated on a case-by-case basis to identify mitigation to achieve the “normally acceptable” exterior levels to the extent feasible, and to determine the level of significance of the noise exposure.
- Commercial (retail, restaurant, etc.) and Office (personal, business, professional): Normally acceptable maximum exterior ambient noise level of 75 dB(A) L_{dn} ; clearly unacceptable maximum exterior noise level of 80 dB(A) L_{dn} ; maximum interior noise level of 50 dB(A) L_{dn} .
- Residential: Normally acceptable maximum exterior ambient noise level of 60 dB(A) L_{dn} in single family neighborhoods and 65 dB(A) L_{dn} in non-residential or multi-family neighborhoods); clearly unacceptable maximum exterior noise level of 75 dB(A) L_{dn} ; maximum interior noise level of 45 dB(A) L_{dn}

8. Population and Housing

Issues: Environmental effects associated population and housing involve actions that would induce substantial population growth or displace substantial numbers of homes or persons.

Impact Evaluation Guidelines: Issues of potentially significant population and housing impacts may involve:

- Growth inducement, such as provision of substantial population or employment growth or creation of substantial housing demand; development in an undeveloped area, or extension/ expansion of major infrastructure that could support additional future growth.
- Loss of a substantial number of housing units, especially loss of more affordable housing.

9. Public Services and Utilities - Discussion

Issues: This section evaluates project effects on fire and police protection services, schools, public facility maintenance and other governmental services, utilities, including electric and natural gas, water and sewer service, and solid waste disposal.

Impact Evaluation Guidelines: The following may be identified as significant public services and facilities impacts:

- Creation of a substantial need for increased police department, fire department, public facility maintenance, or government services staff or equipment.
- Generation of substantial numbers of students exceeding public school capacity where schools have been designated as overcrowded.
- Inadequate water, sewage disposal, or utility facilities.
- Substantial increase in solid waste disposal to area sanitary landfills.

Sewer: The maximum capacity of the El Estero Treatment Plant is 11 million gallons per day (MGD), with current average daily flows in 2011 of 8 MGD. In 2010, the City certified a citywide Program Final Environmental Impact Report (FEIR) for the Plan Santa Barbara General Plan Update. This FEIR concluded that the increased wastewater flows to El Estero Wastewater Treatment Plant are enough to accommodate the growth planned through 2030 for the City. The FEIR also concluded that the increased wastewater flows into the City’s collection systems would not substantially contribute to current problems of offsite inflow and infiltration of wastewater flows from the City’s system.

Water: The City of Santa Barbara’s water supply comes primarily from the following sources, with the actual share of each determined by availability and level of customer demand: Lake Cachuma and Tecolote Tunnel; Gibraltar Reservoir, Devils Canyon and Mission Tunnel; groundwater; State Water Project Table

A allotment; desalination; and recycled water. Conservation and efficiency improvements are projected to contribute to the supply by offsetting demand that would otherwise have to be supplied by additional sources. On June 14, 2011, based on the comprehensive review of the City's water supply, the City Council approved the Long Term Water Supply Program (LTWSP) for the planning period 2011-2030. The LTWSP outlines a strategy to use the above sources to meet the City's estimated system demand (potable plus recycled water) of 14,000 AFY, plus a 10% safety margin equal to 1,400 AFY, for a total water supply target of 15,400 AFY. The LTWSP concludes that the City's water supply is adequate to serve the anticipated demand plus safety margin during the planning period.

Solid Waste: Most of the waste generated in the City is transported on a daily basis to seven landfills located around the County. The County of Santa Barbara, which operates the landfills, has developed impact significance thresholds related to the impacts of development on remaining landfill capacity. These thresholds are utilized by the City to analyze solid waste impacts. The County thresholds are based on the projected average solid waste generation for Santa Barbara County from 1990-2005. The County assumes a 1.2% annual increase (approximately 4000 tons per year) in solid waste generation over the 15-year period. The County's threshold for project specific impacts to the solid waste system is 196 tons per year (this figure represents 5% of the expected average annual increase in solid waste generation [4000 tons per year]) for project operations. Source reduction, recycling, and composting can reduce a project's waste stream by as much as 50%. If a proposed project generates 196 or more tons per year after reduction and recycling efforts, impacts would be considered significant and unavoidable. Proposed projects with a project specific impact as identified above (196 tons per year or more) would also be considered cumulatively significant, as the project specific threshold of significance is based on a cumulative growth scenario. However, as landfill space is already extremely limited, any increase in solid waste of 1% or more of the expected average annual increase in solid waste generation [4000 tons per year], which equates to 40 tons per year, is considered adverse significant cumulative impact.

The County of Santa Barbara adopted revised solid waste generation thresholds and guidelines in October 2008. According to the County's thresholds of significance, any construction, demolition or remodeling project of a commercial, industrial or residential development that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on solid waste generation. The County's 350-ton threshold has not been formally adopted by the City; however, it provides a useful method for calculating and analyzing construction waste generated by a project.

Facilities and Services: In 2010, the City certified a citywide Program Final Environmental Impact Report (FEIR) for the Plan Santa Barbara General Plan Update. The FEIR concluded that under existing conditions as well as the projected planned development and all studied alternatives, all public services (police, fire, library, public facilities, governmental facilities, electrical power, natural gas and communications) could accommodate the potential additional growth until 2030. The FEIR also determined that growth in the City under the General Plan would not result in a considerable contribution to cumulative impacts on public services on the South Coast.

Schools: None of the school districts in the South Coast have been designated "overcrowded" as defined by California State law. Per California Government Code Section 66000, the City collects development impact fees from new development to offset the cost of providing school services/additional infrastructure to accommodate new students generated by the development.

10. Recreation

Issues: Recreational issues are associated with increased demand for recreational facilities, or, loss of or impacts to existing recreational facilities or parks.

Impact Evaluation Guidelines: Recreation impacts may be significant if they result in:

- Substantial increase in demand for park and recreation facilities in an area under-served by existing

public park and recreation facilities.

- Substantial loss or interference with existing park space or other public recreational facilities such as hiking, cycling, or horse trails.

11. Transportation

Issues: Transportation issues include traffic, access, circulation and safety. Vehicle, bicycle and pedestrian, and mass transit modes of transportation are all considered, as well as emergency vehicle access. The City General Plan Circulation Element contains policies addressing circulation and traffic in the City. Projects near the City's airport may also be considered for effects to air traffic patterns and safety.

Impact Evaluation Guidelines: A proposed project may have a significant impact on traffic and circulation if it would:

Vehicle Traffic

- Cause an increase in traffic that is substantial in relation to the existing traffic load and street system capacity (see traffic thresholds below).
- Cause insufficiency in the transit system, taking into account all modes of transportation.
- Conflict with the Congestion Management Plan (CMP) or Circulation Element or other adopted plan or policy pertaining to vehicle or transit systems.

Circulation and Traffic Safety

- Create potential hazards due to addition of traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure) or that supports uses that would be incompatible with substantial increases in traffic.
- Diminish or reduce effectiveness, adequacy, or safety of pedestrian, bicycle, or public transit circulation.
- Result in inadequate emergency access on-site or to nearby uses.
- Conflict with regional and local plans, policies, or ordinances regarding the circulation system, including all modes of transportation (vehicle, pedestrian, bicycle, and public transportation).

Air Traffic

- Substantially change air traffic patterns or pose safety risks associated with air traffic.

Vehicle Traffic Thresholds of Significance: The City uses Levels of Service (LOS) "A" through "F" to describe operating conditions at signalized intersections in terms of volume-to-capacity (V/C) ratios, with LOS A (0.50-0.60 V/C) representing free flowing conditions and LOS F (0.90+ V/C) describing conditions of substantial delay. The City General Plan Circulation Element establishes the goal for City intersections to not exceed LOS C (0.70-0.80 V/C).

For purposes of environmental assessment, LOS C at 0.77 V/C is the threshold Level of Service against which impacts are measured. An intersection is considered "impacted" if the volume to capacity ratio is .77 V/C or greater.

Project-Specific Significant Impact: A significant project-specific traffic impact would result if a project's net peak- traffic generation would constitute 1% or more of the intersection capacity at one or more of the following intersections:

1. Olive Mill Road & Coast Village Road
2. Coast Village Road Roundabout
3. Milpas Street & Quinientos Street

4. Milpas Street & Haley Street
5. Garden Street & Gutierrez Street
6. Garden Street & Highway 101 Northbound Ramps
7. Garden Street & Highway 101 Southbound Ramps
8. Castillo Street & Haley Street
9. Carrillo Street & Highway 101 Northbound Ramps
10. Carrillo Street & Highway 101 Southbound Ramps
11. Carrillo Street & San Andres Street
12. Mission Street & State Street
13. Mission Street & Castillo Street
14. Mission Street and Bath Street
15. Mission Street & Highway 101 Northbound Ramps
16. Mission Street & Highway 101 Southbound Ramps
17. Mission Street & Modoc Road
18. Meigs Road and Cliff Drive
19. Las Positas Road & Cliff Drive
20. Las Positas Road & Modoc Road
21. Las Positas Road and Highway 101 Southbound Ramps
22. Calle Real & Highway 101 Northbound Ramps
23. Las Positas Road & State Street
24. Hitchcock Way & State Street
25. Hope Avenue & State Street
26. La Cumbre Road & State Street
27. Hope Avenue, Calle Real & Highway 101 Northbound Ramps

Significant Cumulative Contribution: A considerable project contribution to significant cumulative traffic effects would result when a project's net peak-hour traffic together with other cumulative traffic from existing and reasonably foreseeable pending project would cause an intersection level of service to exceed 0.77 volume to capacity (V/C) ratio; or when the project would contribute peak-hour traffic to an intersection already exceeding a 0.77 V/C ratio level of service.

Airport Area: Traffic analysis for projects at the airport and surrounding City parcels will not be subject to the updated threshold because that threshold is specific to specified intersections within the main part of the City jurisdiction. Projects proposed in the airport area shall use the following project-specific traffic threshold: A significant project-specific traffic impact would result if a project's net peak-hour traffic generation would increase the volume-to-capacity (V/C) ratio at an intersection to greater than .77, or would increase the V/C ratio by .01 or more when an intersection is already operating at greater than .77 V/C during peak hours. The City's traffic analysis of projects proposed in the airport area shall be coordinated with County, City of Goleta, and Caltrans traffic thresholds as appropriate under CEQA.

12. Water Quality and Hydrology

Issues: Water resources issues include changes in surface drainage, creeks, surface water quality, groundwater quantity and quality, flooding, and inundation.

Impact Evaluation Guidelines: A significant impact would result from:

Water Resources and Drainage

- Substantially changing the amount of surface water in any water body or the quantity of groundwater recharge.
- Substantially changing the drainage pattern or creating a substantially increased amount or rate of surface water runoff that would exceed the capacity of existing or planned drainage and storm water systems.
- Altering drainage patterns or affecting creeks in a way that would cause substantial erosion, siltation, on- or off-site flooding, or impacts to sensitive biological resources (See Section 3 as well).

Water Quality

- Substantial discharge of sediment or pollutants into surface water or groundwater, or otherwise degrading water quality, including temperature, dissolved oxygen, or turbidity.

The City of Santa Barbara began implementing the Storm Water Management Program (SWMP) in January of 2009. The purpose of the SWMP is to implement and enforce a program designed to reduce the discharge of pollutants to the “maximum extent practicable” to protect water quality. The SWMP addresses discharge of pollutants both during construction and after construction. The water quality treatment requirement is to retain and treat the 1-inch, 24-hr. storm event. The peak runoff discharge rate requirement is that the peak runoff discharge rate shall not exceed the pre-development rate up to the 25 year storm. The volume reduction requirement is to retain on site the volume difference between pre and post conditions for the 25-yr, 24-hr storm or the 1-inch storm (whichever is larger).

Flooding and Inundation Hazards

- Locating development within 100-year flood hazard areas; substantially altering the course or flow of flood waters or otherwise exposing people or property to substantial flood hazard.
- Exposing people or structures to substantial unmitigated risk involving inundation by seiche, tsunami, or mudflow.

Standard Conditions of Approval Applicable to Project

The following is an initial identification of standard conditions of approval that would be applicable to the project based on the project description and to assure consistency with policies and ordinance provisions. Additional project conditions of approval may be applied, and condition wording may be adjusted for the project based on further project review and decision-maker findings.

Agreement to Conditions

Project Plans and Implementation. Plans shall show all design, landscape and restoration elements approved by Design Review, and all elements and specifications shall be implemented on site.

Recorded Conditions Agreement. The owner shall execute a City-approved written instrument to include the following (items below to be further specified):

- Approved development
- Development rights restrictions and easements
- Building height restriction
- Landscape plan and biological restoration compliance
- Storm water pollution control and drainage systems implementation and maintenance
- Geotechnical and coastal bluff liability limitations

Mitigation Monitoring and Reporting. The owner shall implement the mitigation monitoring and reporting program for the project's mitigation measures outlined in the mitigated negative declaration for the project.

- **Project Environmental Coordinator Required.** Submit to the Planning Division a contract with a qualified independent consultant to act as the Project Environmental Coordinator (PEC). Both the PEC and the contract are subject to approval by the project Environmental Analyst. The PEC shall be responsible for assuring full compliance with the provisions of the Mitigation Monitoring and Reporting Program (MMRP) and Conditions of Approval to the City. The contract shall include the following, at a minimum:
 - The frequency and/or schedule of the monitoring of the mitigation measures.
 - A method for monitoring the mitigation measures.
 - A list of reporting procedures, including the responsible party, and frequency.
 - A list of other monitors to be hired, if applicable, and their qualifications.
 - Submittal of weekly / biweekly / monthly reports during demolition, excavation, grading and footing installation and biweekly / monthly reports on all other construction activity regarding MMRP and condition compliance by the PEC to the Community Development Department/Case Planner.
 - Submittal of a Final Mitigation Monitoring Report.
 - The PEC shall have authority over all other monitors/specialists, the contractor, and all construction personnel for those actions that relate to the items listed in the MMRP and conditions of approval, including the authority to stop work, if necessary, to achieve compliance with mitigation measures.
- **Mitigation Monitoring Compliance Reports.** The PEC shall submit _____ reports to the Community Development Department, Planning Division, during demolition, excavation, grading and footing installation and _____ reports on all other construction activity regarding MMRP compliance.

Visual Aesthetics

Design Review. The project, including public improvements, is subject to the review and approval of the Single Family Design Board (SFDB with project incorporation of Planning Commission land use conditions including:

- Landscape plan and biological restoration measures, including protective measures implemented during construction; appropriate plant materials on bluffs and steep slopes; irrigation systems; landscape screening; screening for utility and foundation stability devices. (items to be further specified)
- Project exterior lighting plans consistent with SBMC provisions to avoid substantial effects to neighboring residents, habitats, and travel safety.

Air Quality

Air Quality and Dust Control. The following measures shall be shown on grading and building plans and shall be adhered to throughout grading, hauling, and construction activities:

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.
- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.
- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.
- All portable diesel-powered construction equipment shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit.
- Fleet owners of mobile construction equipment are subject to the California Air Resource Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.
- All commercial diesel vehicles are subject to Title 13, § 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.
- Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.

- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

Biological Resources

Fish and Wildlife Fee. The California Department of Fish and Wildlife fee shall be paid by the owner immediately upon project approval. A delay in payment will result in a delay in filing the required CEQA Notice of Determination.

Design Review. See item under Visual Resources above for approval of landscape and biological restoration plan, to include measures for establishment of new vegetation.

Biological Monitoring Contract. Submit a contract with a qualified biologist acceptable to City for specified biological monitoring for construction period and establishment of restoration and landscape vegetation and temporary irrigation.

Cultural Resources

Unanticipated Archaeological Resources Process and Contractor Notification. Standard discovery measures shall be implemented per the City master Environmental Assessment throughout grading and construction: Prior to the start of any vegetation or paving removal, demolition, trenching or grading, contractors and construction personnel shall be alerted to the possibility of uncovering unanticipated subsurface archaeological features or artifacts. If such archaeological resources are encountered or suspected, work shall be halted immediately, the City Environmental Analyst shall be notified and the Owner shall retain an archaeologist from the most current City Qualified Archaeologists List. The latter shall be employed to assess the nature, extent and significance of any discoveries and to develop appropriate management recommendations for archaeological resource treatment, which may include, but are not limited to, redirection of grading and/or excavation activities, consultation and/or monitoring with a Barbareño Chumash representative from the most current City qualified Barbareño Chumash Site Monitors List, etc. Measures to address resource discovery shall be approved by the Environmental Analyst and implemented by applicant to avoid significant impacts to important resources.

If the discovery consists of possible human remains, the Santa Barbara County Coroner shall be contacted immediately. If the Coroner determines that the remains are Native American, the Coroner shall contact the California Native American Heritage Commission. A Barbareño Chumash representative from the most current City Qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.

If the discovery consists of possible prehistoric or Native American artifacts or materials, a Barbareño Chumash representative from the most current City Qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.

A final report on the results of the archaeological monitoring shall be submitted by the City-approved archaeologist to the Environmental Analyst within 180 days of completion of the monitoring and prior to any certificate of occupancy for the project.

Public Services, Facilities, Utilities

Water Rights. The owner shall assign to the City exclusive right to extract ground water under the property.

Public Improvement Plans. Public improvement plans shall be submitted to the Public Works Department for review and approval.

Dedications. Easements shown on plans shall be subject to City approval of easement scope and locations.

Transportation

Haul Routes Require Separate Permit. Apply for a Public Works Permit to establish the haul route(s) for all construction-related trucks with a gross vehicle weight rating of three tons or more, entering or exiting the site. The Haul Routes shall be approved by the Transportation Engineer.

Construction-Related Truck Trips. Construction-related truck trips for trucks with a gross vehicle weight rating of three tons or more shall not be scheduled during peak hours (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.) in order to help reduce truck traffic on adjacent streets and roadways.

Construction Parking. During construction, free parking spaces for construction workers shall be provided on-site or off-site in locations subject to the approval of the Transportation Manager.

Construction Storage/Staging. Construction vehicle/ equipment/ materials storage and staging shall be done per specified locations approved by the Transportation Manager. No parking or storage shall be permitted within the public right-of-way, unless specifically permitted by the Transportation Manager with a Public Works permit.

Water Quality and Hydrology

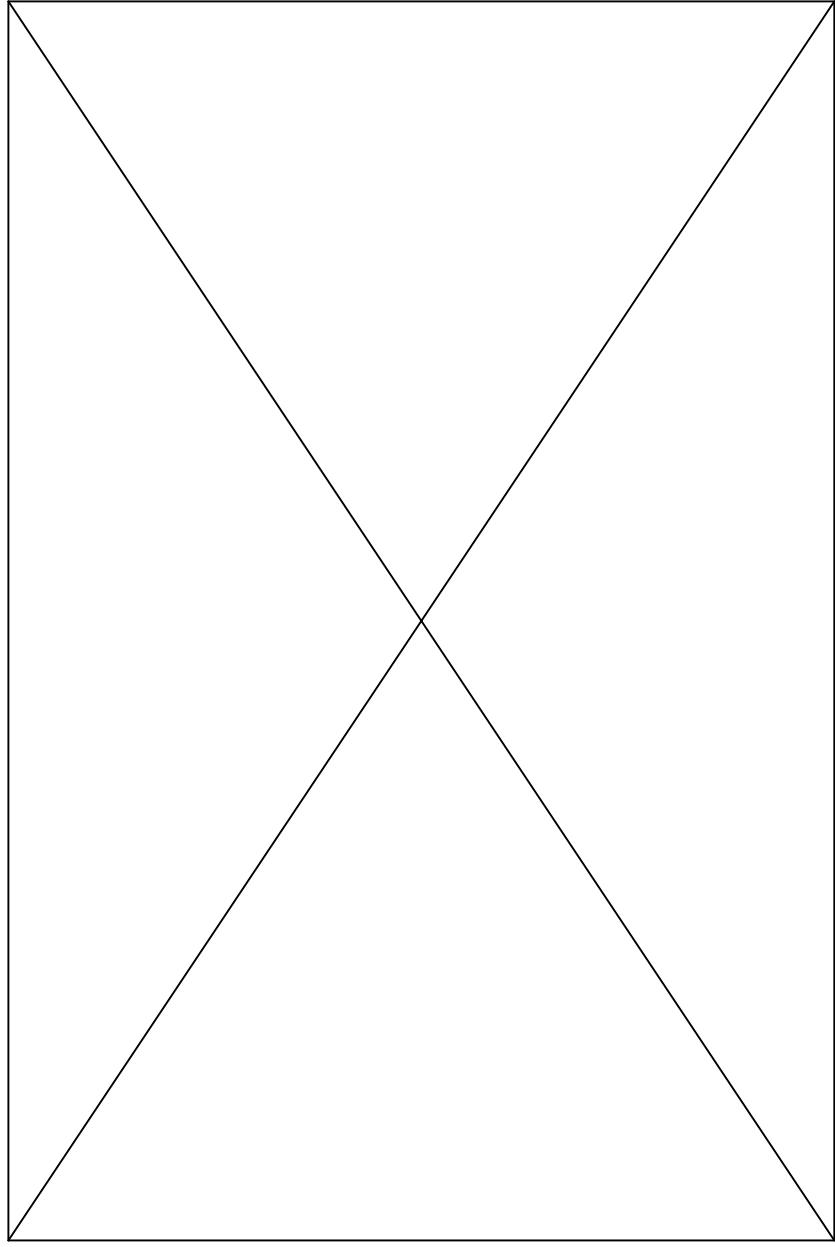
Drainage and Water Quality. The project is required to comply with Tier 3 of the Storm Water BMP Guidance Manual, pursuant to Santa Barbara Municipal Code Chapter 22.87 for treatment, rate and volume. The Owner shall submit (specified information) prepared by a registered civil engineer or licensed architect demonstrating that the new development will comply with the City's Storm Water BMP Guidance Manual. Project plans for grading, drainage, storm water facilities and treatment methods, and project development, shall be subject to review and approval by the City Building Division and Public Works Department. Sufficient engineered design and adequate measures shall be employed to ensure that no unpermitted construction-related or long-term effects from increased runoff, erosion and sedimentation, urban water pollutants, or groundwater pollutants would result from the project.

For any proprietary treatment devices that are proposed as part of the project's final Storm Water Management Plan, the Owner shall provide an Operations and Maintenance Procedure Plan consistent with the manufacturer's specifications (describing schedules and estimated annual maintenance costs for pollution absorbing filter media replacement, sediment removal, etc.). The Plan shall be reviewed and approved by the Creeks Division for consistency with the Storm Water BMP Guidance Manual and the manufacturer's specifications.

After certificate of occupancy is granted, any proprietary treatment devices installed will be subject to water quality testing by City Staff to ensure they are performing as designed and are operating in compliance with the City's Storm Water MS4 Permit.



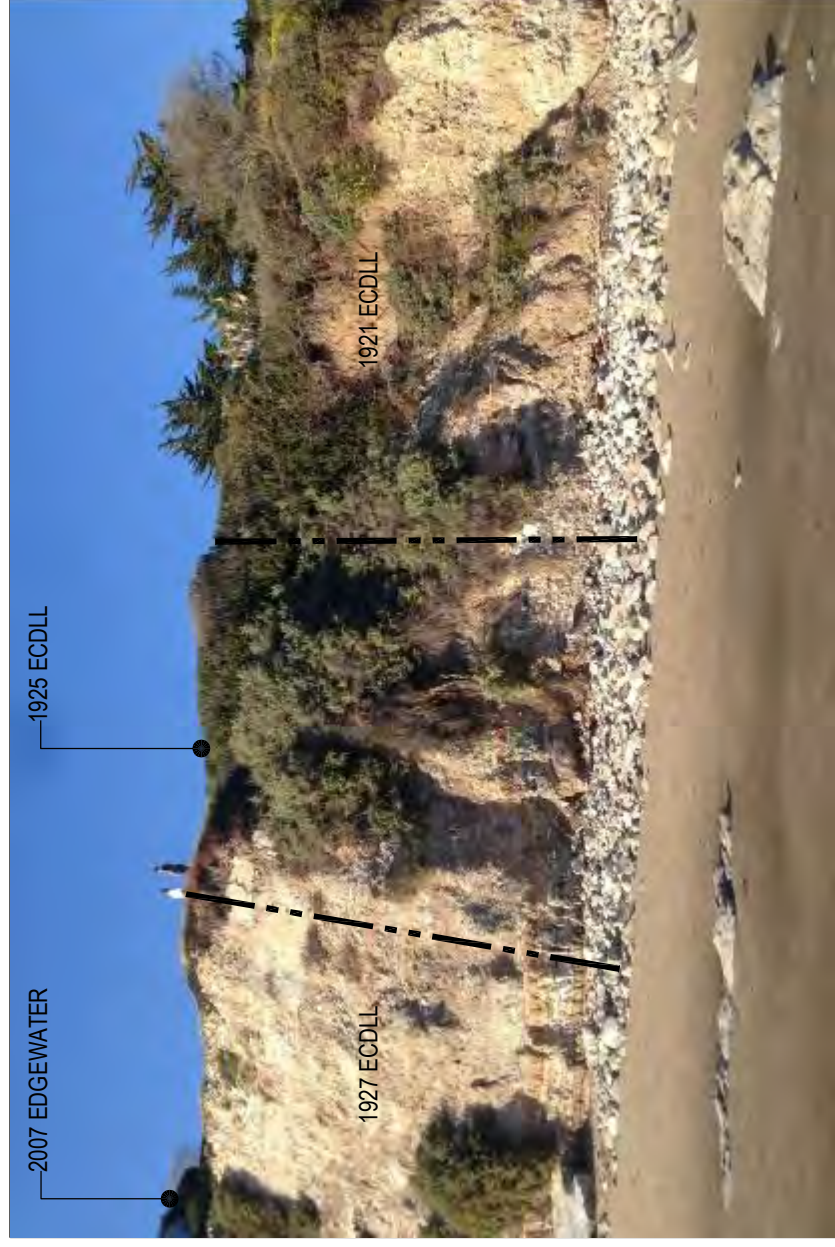
VIEW FROM ECDLL LOOKING DOWN EXISTING DRIVEWAY
OF 1925 + 1927 ECDLL (05.23.12)



-5



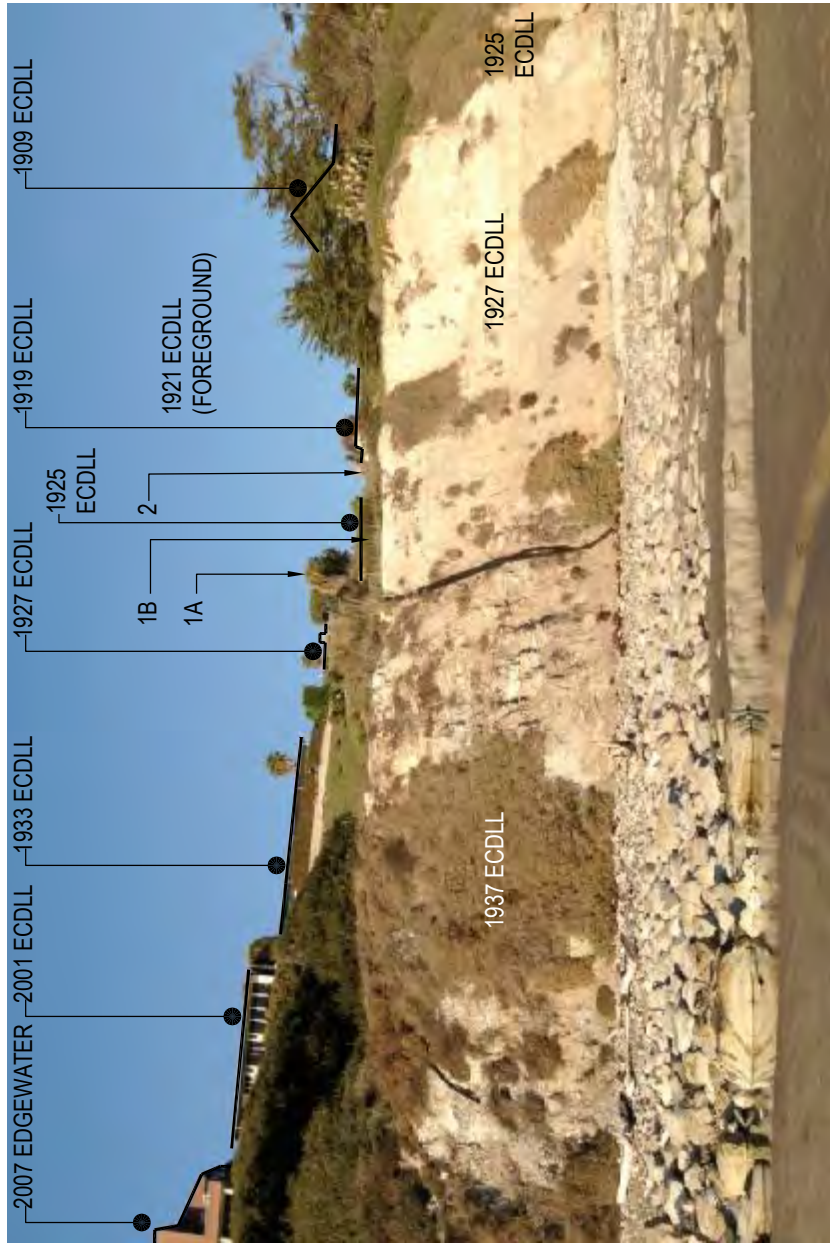
VIEW FROM ECDLL ALONG THE 1921-1919 ECDLL DRIVEWAY TO THE
SANTA BARBARA CHANNEL AND SANTA CRUZ ISLAND (05.23.12)



VIEW FROM LOWER LOW TIDE BEACH PLANE LOOKING NORTH AT 1925 ECDLL
VEGETATED COASTAL BLUFF FACE AT 1925 ECDLL VEGETATION ON COASTAL BLUFF TOP SCREENS
ROOF LINE AT TOP OF 1925 ECDLL HOUSE FROM THIS PERSPECTIVE AT LOW TIDE BEACH.



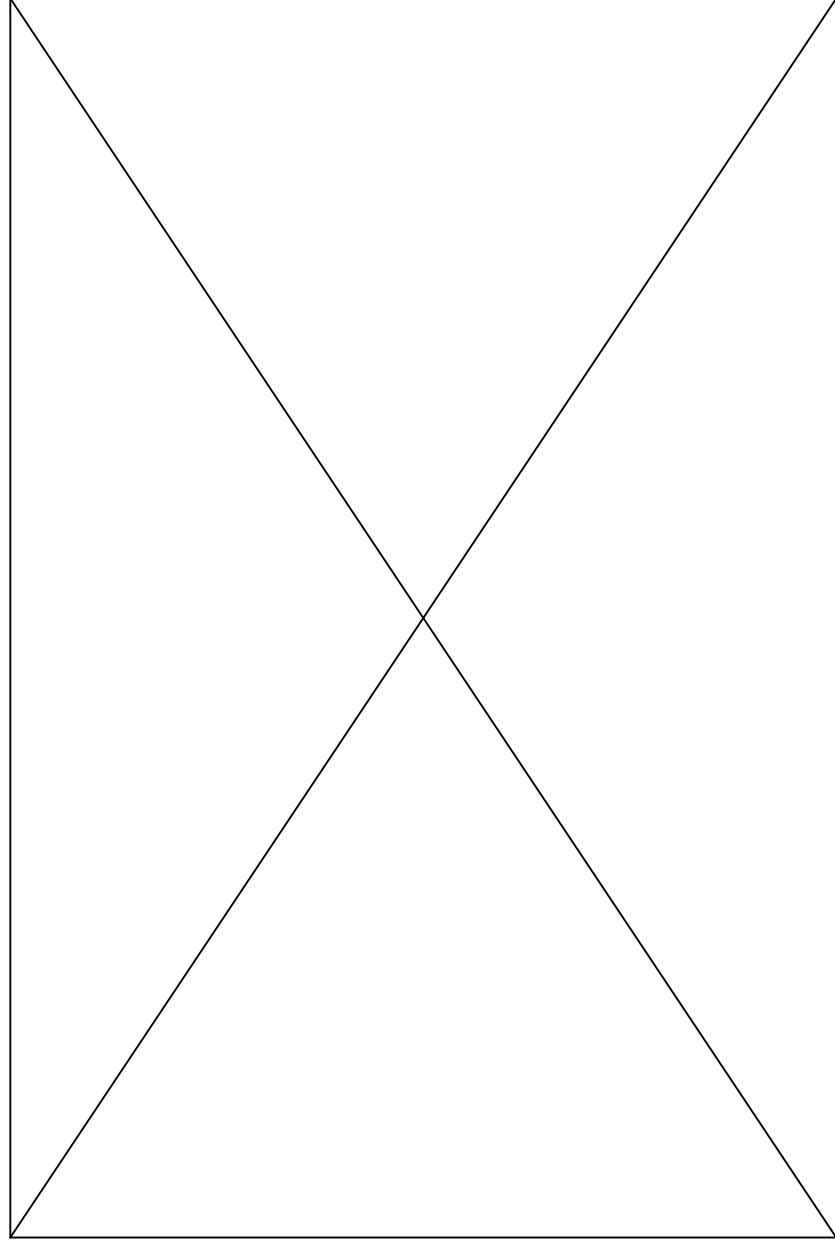
VIEW FROM BEACH LOOKING NORTH TOWARDS PROJECT SITE
VIEW FROM DEC. 14, 2012 LOWER-LOW TIDE BEACH TO BACK BEACH, COASTAL BLUFF, AND TOP EDGES OF ROOF LINES
OF HOUSES IN THE IMMEDIATE NEIGHBORHOOD. THE DEVELOPMENT ENVELOPE AT 1925 ECDLL IS BELOW AND TO THE
RIGHT OF THE TREE AND SHRUBS AT 17 AND TO THE LEFT OF THE TREE AT 2.



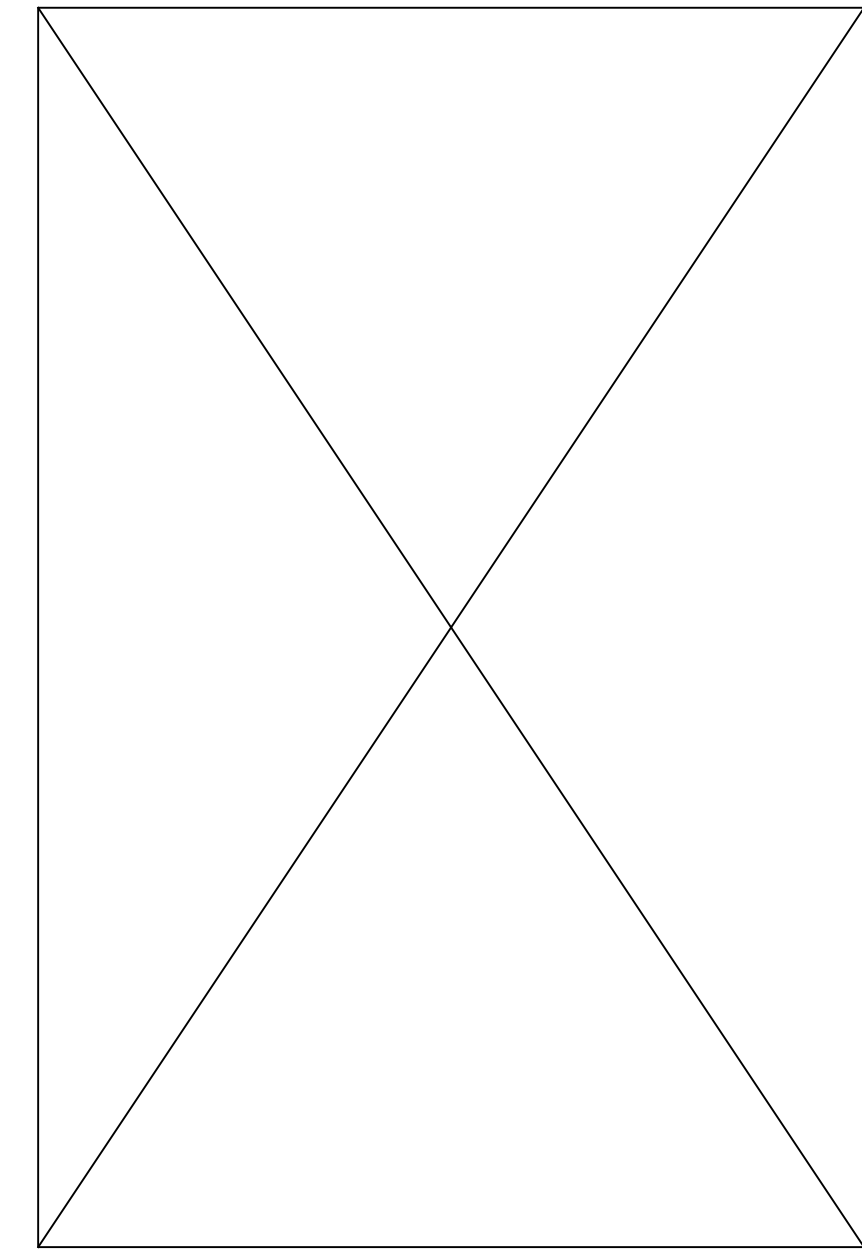
VIEW LOOKING NORTH THROUGH NORTHEAST FROM LOWER LOW TIDE
VIEW FROM THE JAN. 17, 2012 LOWER-LOW TIDE BEACH TO THE BACK BEACH, COASTAL BLUFF, AND TOP EDGES OF ROOF
LINES OF HOUSES IN THE IMMEDIATE NEIGHBORHOOD. THE DEVELOPMENT ENVELOPE AT 1925 ECDLL IS TO THE RIGHT
OF THE TREE AND SHRUBS AT 1A, BEHIND AND SLIGHTLY ABOVE THE SHRUBS AT 1B, AND BEHIND AND SLIGHTLY ABOVE
THE SHRUBS AT 2.



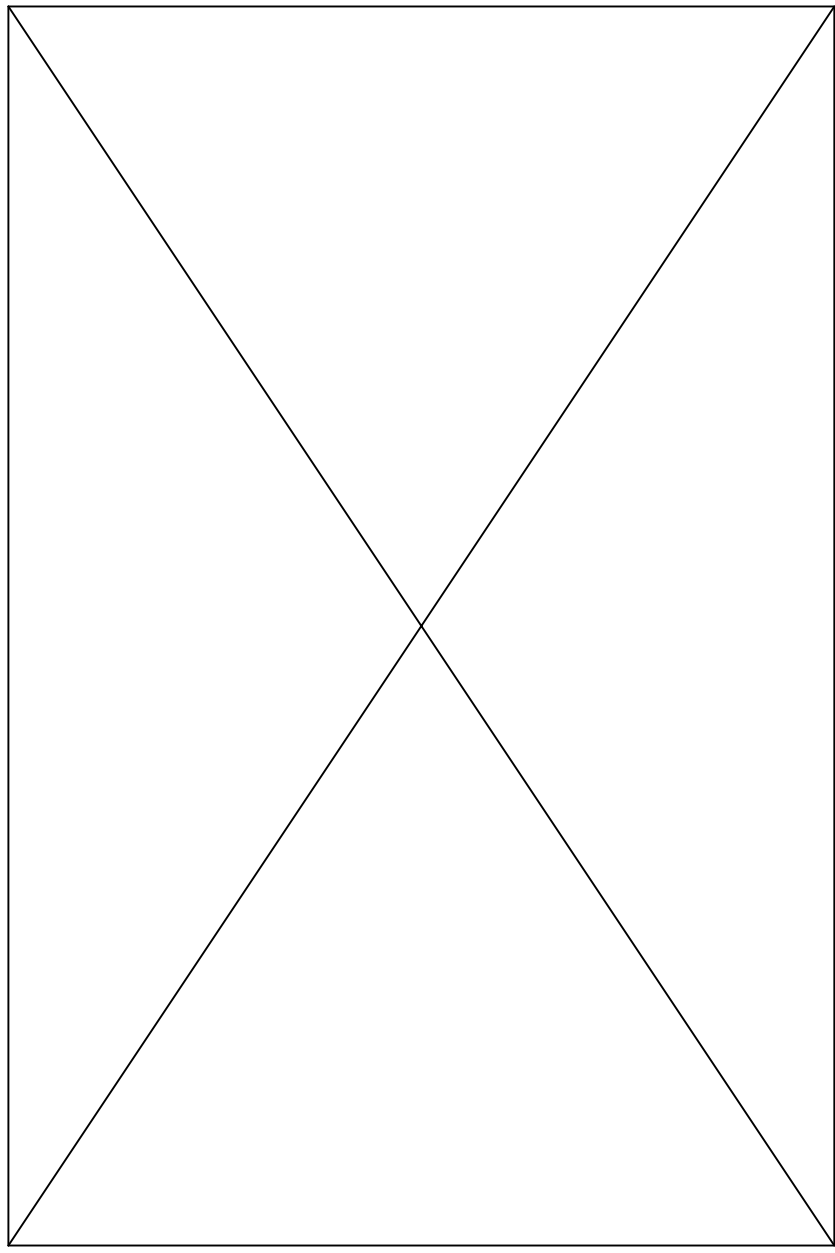
VIEW FROM EXISTING 1921 ECDLL DRIVEWAY
LOOKING NORTHEAST AT 1919 ECDLL (05.23.12)



-7



-4



-8



KEY PLAN
NTS

AB

DESIGN STUDIO
INCORPORATED
PH | 805.963.2100
FX | 805.963.2100
200 EAST HALEY STREET
SANTA BARBARA, CALIFORNIA 93101
WWW.ABDESIGNSTUDIO.COM

PROJECT TEAM

[COASTAL CONSISTENCY ANALYSIS]

Norbert Dall, Stephanie Dall
Dall & Associates
930 Florin Road, Suite 200
Sacramento, CA 95831
PH: 916.422.0283
FX: 916.422.0283
e: norbert@dall.com
sdall49@aol.com

[GEOLOGICAL ENGINEER, ENGINEERING
DESIGN]

Pat Shiras, John Wallace
Cotton, Shiras & Assoc., Inc.
2804 Camino Dos Rios, Ste 201
Thousand Oaks, CA 91320
PH: 805.395.1950
FX: 805.395.1950
e: cotton@cottonshiras.com

[CIVIL ENGINEER]

Chapelle Grant, ACE
Cotton, Shiras & Assoc., Inc.
PH: 330.826.3525
FX: 330.854.0550
e: clgrant@cssnet.com

[BIOLOGIST]

Geoff Smick
WRA, Inc.
2169-G East Francisco Blvd.
San Francisco, CA 94133
PH: 415.454.8868
e: smick@wra-ca.com

[COASTAL HAZARDS / WAVE RUNUP]

David Skelly, MS, PE
Geo Soils, Inc.
5741 Palmer Way
Carlsbad, CA 92010
PH: 760.438.3155
e: dskelly@geosoilsinc.com

[HISTORIC COASTAL RECONSTRUCTION
ANALYSIS]

Joseph Stepan, Geosciences
3001 Roby Drive
Medford, OR 97504
PH: 541.680.7595
e: jstepan@charter.net

[SURVEYOR]

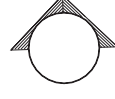
Paul Cook
L.P. Cook & Company
1029 State Street
Santa Barbara, CA 93101
PH: 805.966.5105
e: pcook@lpcook.com

EMPRISE TRUST RESIDENCE

06.03.2016



KEY SITE PLAN



VIEW KEY



EMPRISE TRUST RESIDENCE

06.03.2016



VIEW FROM ECDLL LOOKING DOWN EXISTING DRIVEWAY
OF 1925 + 1927 ECDLL

1

EMPRISE TRUST RESIDENCE

06.03.2016



VIEW FROM ECDLL ALONG THE 1921-1919 ECDLL DRIVEWAY TO THE SANTA BARBARA
CHANNEL AND SANTA CRUZ ISLAND

2

EMPRISE TRUST RESIDENCE

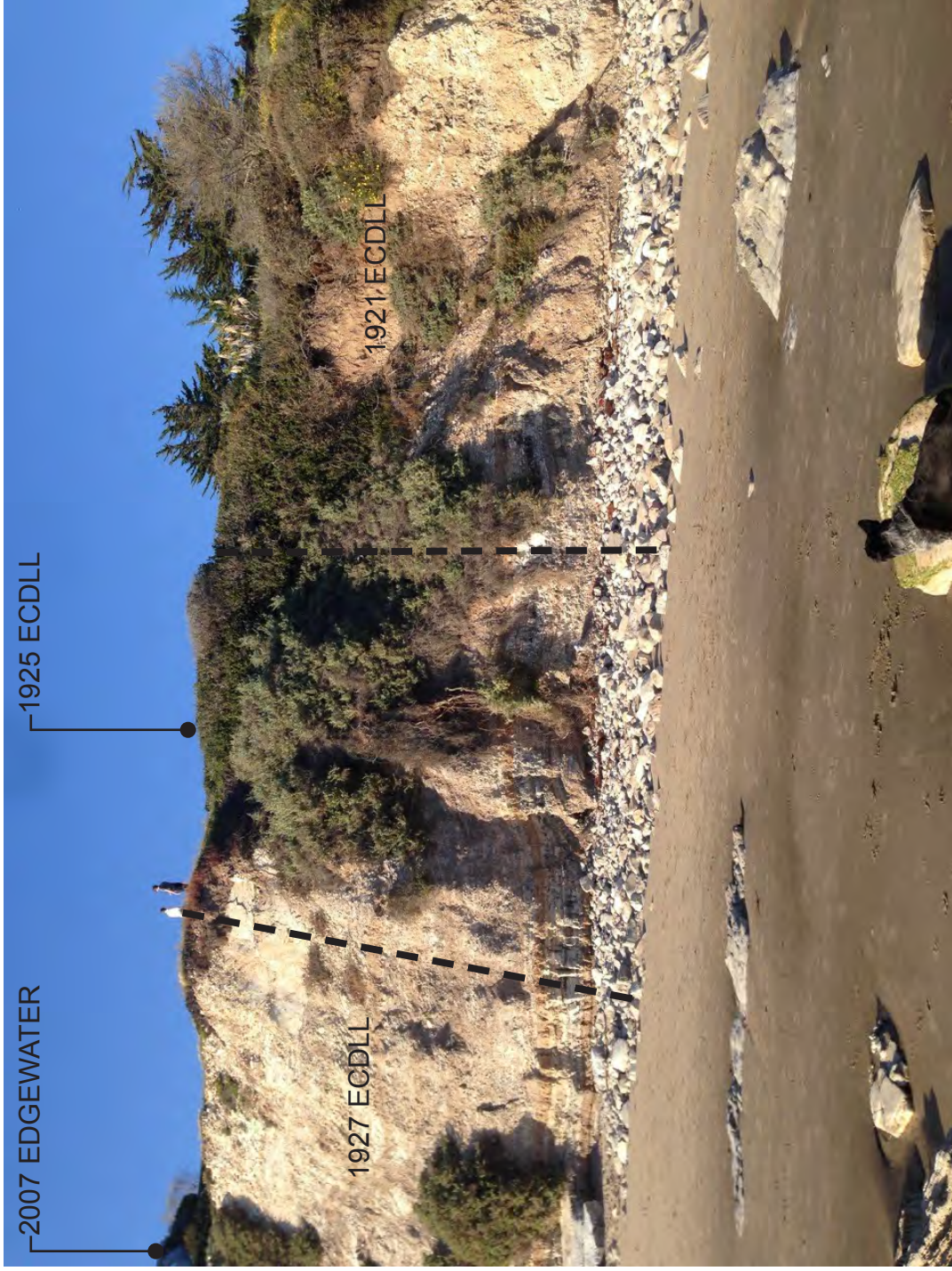
06.03.2016



VIEW FROM EXISTING 1921 ECDLL DRIVEWAY LOOKING NORTHEAST AT 1919 ECDLL 3

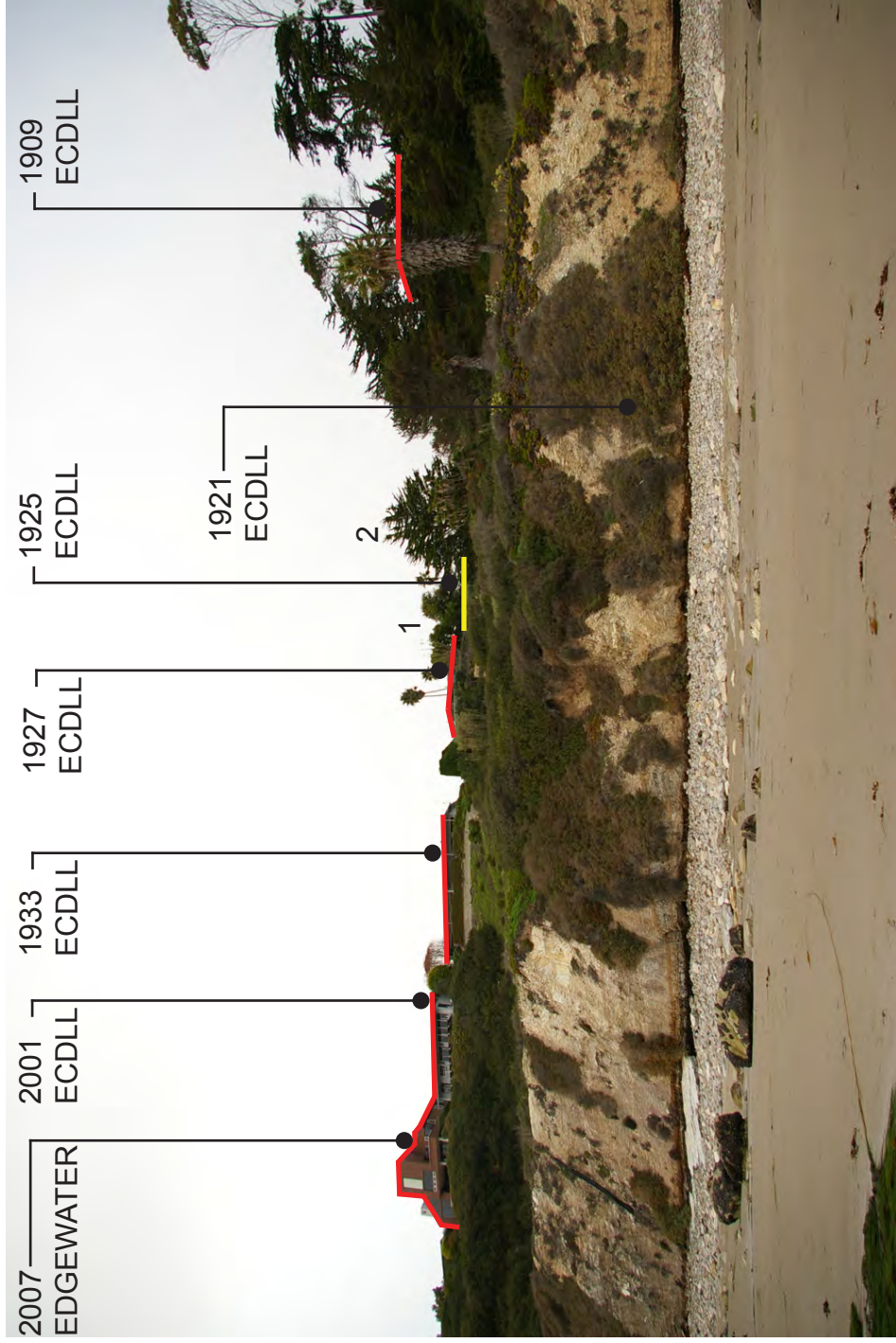
EMPRISE TRUST RESIDENCE

06.03.2016



VIEW FROM LOWER LOW TIDE BEACH PLANE LOOKING NORTH AT 1925 ECDLL **6**

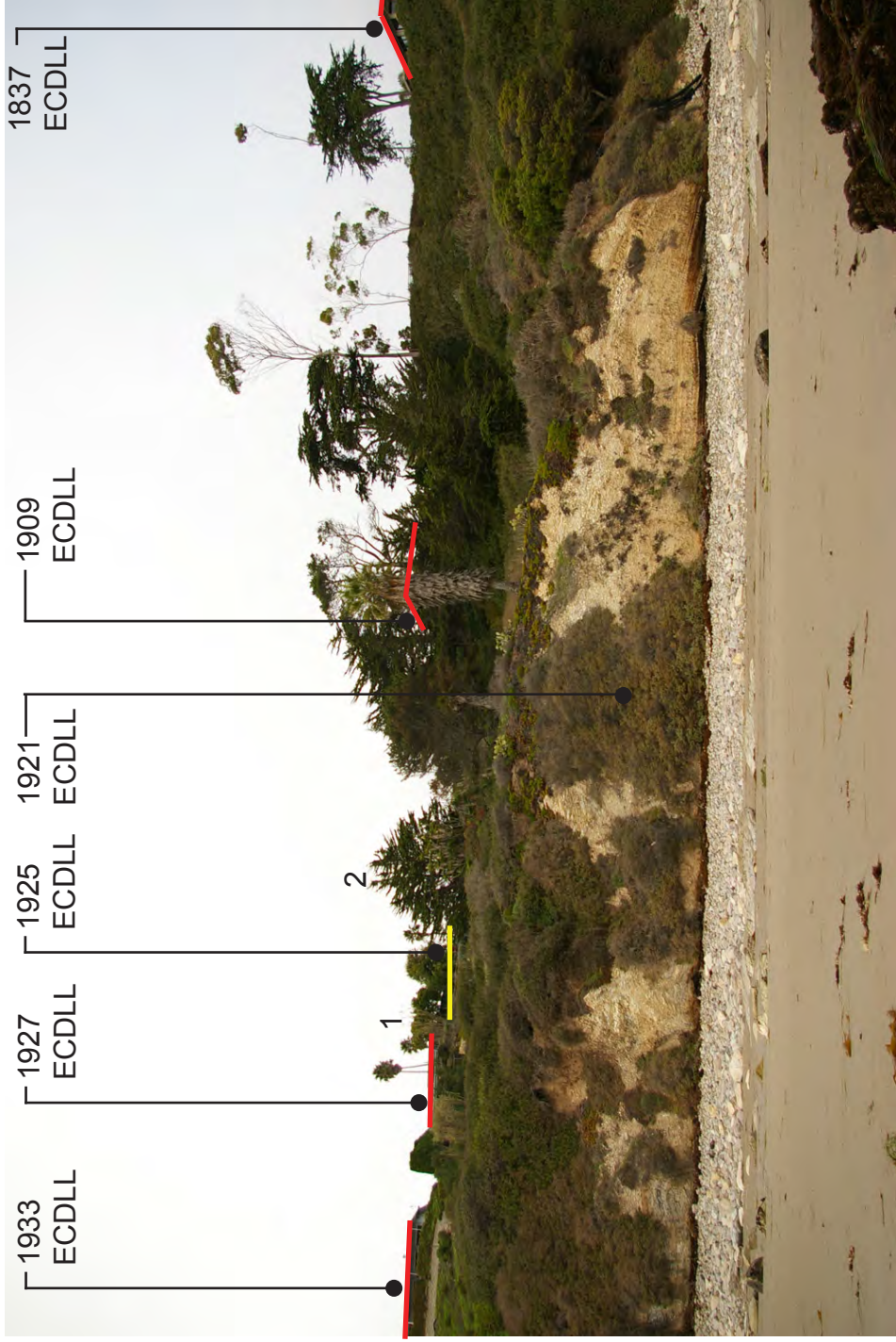
VEGETATED COASTAL BLUFF FACE AT 1925 ECDLL. VEGETATION ON COASTAL BLUFF TOP SCREENS ROOF LINE AT TOP OF 1925 ECDLL HOUSE FROM THIS PERSPECTIVE AT LOW TIDE BEACH. VERTICAL LINES ILLUSTRATE THE EASTERLY AND WESTERLY PROPERTY LINES OF 1925 ECDLL.



VIEW FROM BEACH LOOKING NORTH TOWARDS PROJECT SITE

9

VIEW FROM DEC. 14, 2012 LOWER-LOW TIDE BEACH TO BACK BEACH, COASTAL BLUFF, AND ROOF LINES OF HOUSES (TOP EDGES OF ROOF LINES REPRESENTED BY RED LINES) IN THE IMMEDIATE NEIGHBORHOOD. THE DEVELOPMENT ENVELOPE AT 1925 ECDLL (TOP EDGE OF ROOF LINE REPRESENTED BY YELLOW LINE) IS BELOW AND TO THE RIGHT OF THE TREE AND SHRUBS AT 1 AND TO THE LEFT OF THE TREE AT 2.



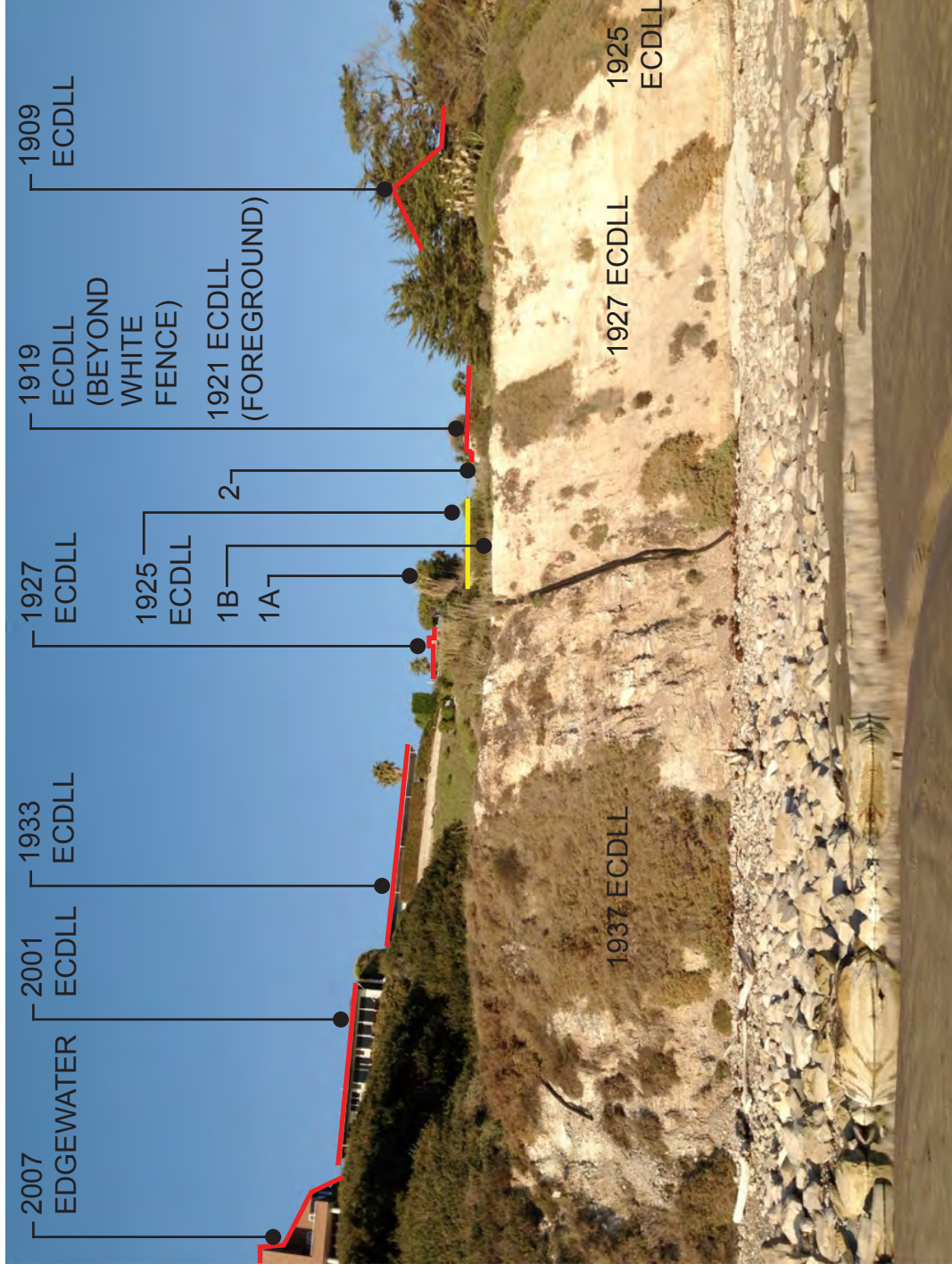
VIEW FROM BEACH LOOKING NORTH TOWARDS PROJECT SITE

10

VIEW FROM THE LOWER-LOW TIDE BEACH (DEC. 14, 2012, MINUS 1.7 FEET MLLW) LOOKING LANDWARD AT THE SAND AND COBBLE BEACH PLANE IN THE LOWER FOREGROUND, COASTAL BLUFF, AND ROOF LINES OF HOUSES (LEFT TO RIGHT, TOP EDGES OF ROOF LINES REPRESENTED BY RED LINES.) 1933 ECDLL, (PARTLY OBSCURED BY VEGETATION) 1927 ECDLL, DEVELOPMENT ENVELOPE AT 1925 ECDLL (TOP EDGE OF ROOF LINE REPRESENTED BY YELLOW LINE) BELOW THE TREE AND SHRUBS AT 1 AND TO THE LEFT AND BEHIND THE TREE AT 2, 1921 ECDLL, (PARTLY OBSCURED BY VEGETATION) 1909 ECDLL, AND 1837 ECDLL AT THE RIGHT OF THE PHOTO.

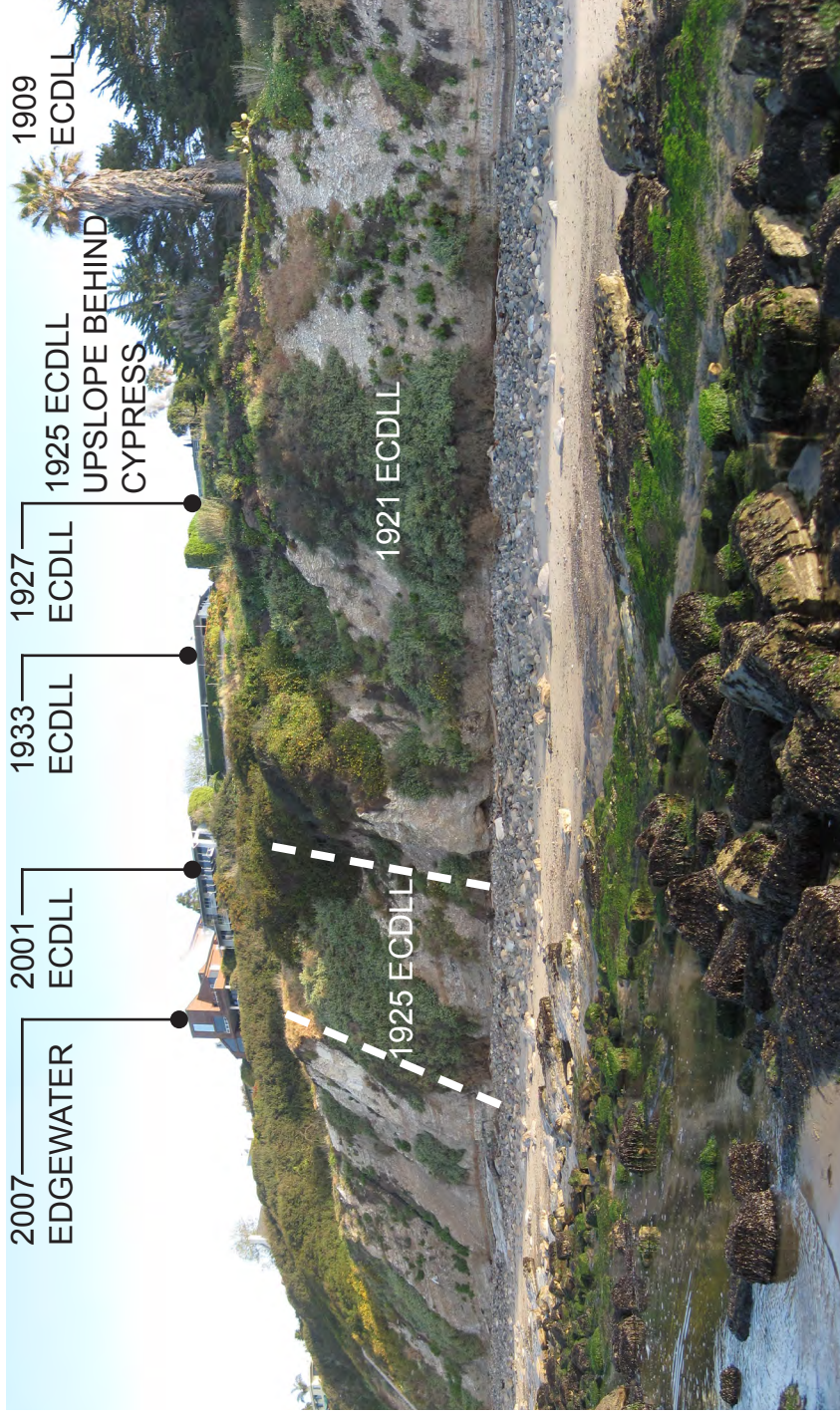
EMPRISE TRUST RESIDENCE

06.03.2016



VIEW LOOKING NORTH THROUGH NORTHEAST FROM LOWER LOW TIDE
VIEW FROM THE JAN. 17, 2012 LOWER-LOW TIDE BEACH TO THE BACK BEACH, COASTAL BLUFF,

AND ROOF LINES OF HOUSES (LEFT TO RIGHT, TOP EDGES OF ROOF LINES REPRESENTED BY RED LINES.) IN THE IMMEDIATE NEIGHBORHOOD. THE DEVELOPMENT ENVELOPE AT 1925 ECDLL (TOP EDGE OF ROOF LINE REPRESENTED BY YELLOW LINE) IS TO THE RIGHT OF THE TREE AND SHRUBS AT 1A, BEHIND AND SLIGHTLY ABOVE THE SHRUBS AT 1B, AND BEHIND AND SLIGHTLY ABOVE THE SHRUBS AT 2.



VIEW FROM BEACH LOOKING NORTH TOWARDS PROJECT SITE
 VIEW OF THE PRIMARILY VEGETATED COASTAL BLUFF AT 1925 ECDLL, AS SEEN FROM THE
 LOWER LOW TIDE PLANE ON APRIL 24, 2010. THE VERTICAL WHITE LINES ILLUSTRATE THE
 EASTERLY AND WESTERLY PROPERTY LINES OF 1925 ECDLL.

20 Closest Lots Data Ranked by FAR for: 1925 El Camino de la Luz

Average/Mean Total of House + Garage Size (including project proposal):	2,713
Average/Mean FAR (including project proposal):	0.21

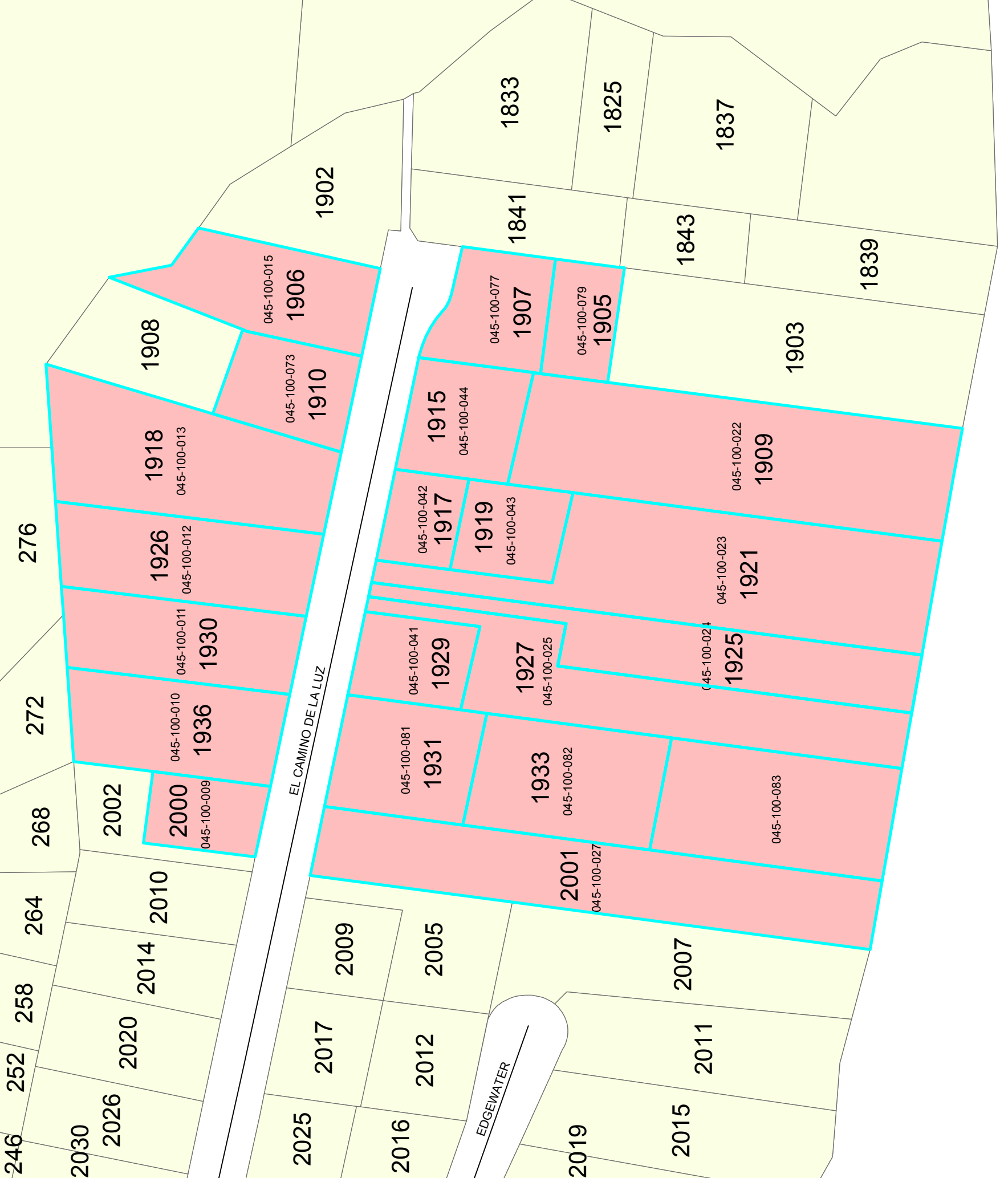
20 Closest Lots Data Ranked by Size for: 1925 El Camino de la Luz

Average/Mean House Size (including project proposal):	2,577
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Parcels Omitted from 20 Closest Lots Data

Form posted 8-20-07

EXHIBIT D2



F.A.R. Calculator

Instructions: Enter the information in the white boxes below. The spreadsheet will calculate the proposed FAR (floor area ratio), the 100% max FAR (per the Zoning Ordinance), and the 85% max FAR (per the Zoning Ordinance). Additionally it will determine whether a FAR Modification is required.

The **Net Lot Area** does not include any Public Road Easements or Public Road Right-of-Way areas. The proposed **TOTAL Net FAR Floor Area** shall include the net floor area of all stories of all building, but may or may not include basement/cellar floor area. For further clarification on these definitions please refer to SBMC §28.15.083.

ENTER Project Address:	1925 E.C.D.L.L. - SB, CA 93109
Is there a basement or cellar existing or proposed?	No
ENTER Proposed TOTAL Net FAR Floor Area (in sq. ft.):	3,545

ENTER Zone ONLY from drop-down list:	E-3
ENTER Net Lot Area (in sq. ft.):	9,913
Is the height of existing or proposed buildings 17 feet or greater?	Yes
Are existing or proposed buildings two stories or greater?	Yes
The FAR Requirements are:	REQUIRED**

ENTER Average Slope of Lot:	27.60%
Does the height of existing or proposed buildings exceed 25 feet?	Yes
Is the site in the Hillside Design District?	Yes
Does the project include 500 or more cu. yds. of grading outside the main building footprint?	Yes
An FAR MOD is required per SBMC §28.15	

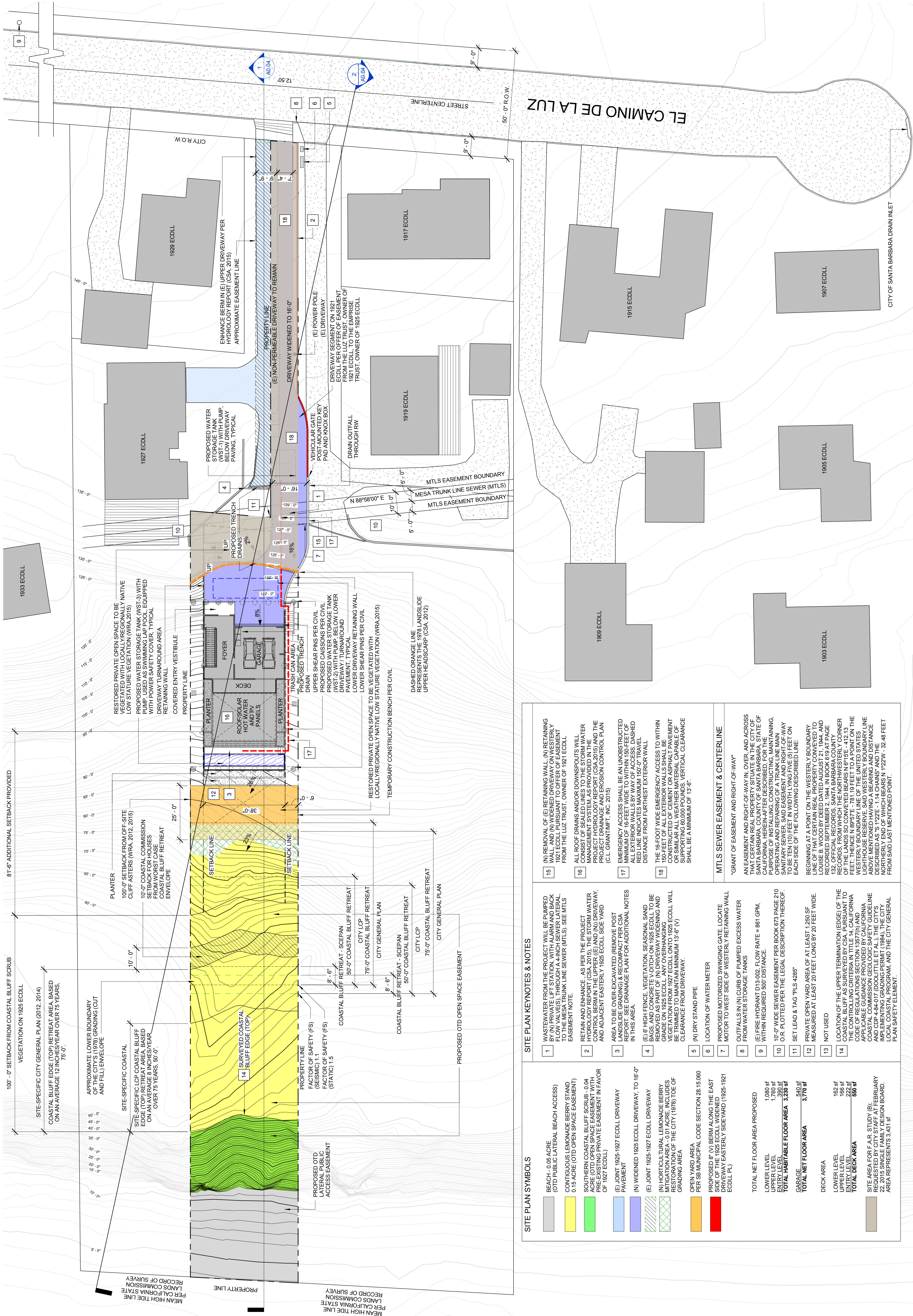
FLOOR AREA RATIO (FAR):	0.357611218
Lot Size Range:	4,000 - 9,999 sq.ft.
MAX FAR Calculation (in sq. ft.):	1,200 + (0.25 x lot size in sq.ft.)
100% MAX FAR:	0.371053163
100% MAX FAR (in sq. ft.):	3678.25
85% of MAX FAR (in sq. ft.):	3126.5125
80% of MAX FAR (in sq. ft.):	2942.6
The 3545 square foot proposed total is 97.0% of the MAX FAR.*	










* **NOTE:** Percentage total is rounded up.

****NOTE:** If your project is located on a site with multiple or overlay zones, please contact Planning Staff to confirm whether the FAR limitations are "Required" or "Guideline".

Acreage Conversion Calculator

ENTER Acreage to Convert to square footage:	1.00
Net Lot Area (in sq. ft.):	43560



SITE PLAN SYMBOLS		SITE PLAN KEYNOTES & NOTES		MTLS SEWER EASEMENT & CENTERLINE	
	BEACH - 0.05 ACRE (OTD PUBLIC LATERAL BEACH ACCESS)	1	WASTEWATER FROM THE PROJECT WILL BE PUMPED BY (N) PRIVATE LIFT STATION, WITH ALARM AND BACK FLOW VALVES, THROUGH A 4-INCH SEWER LATERAL, TO THE MESA TRUNK LINE SEWER (MTLS), SEE MTLS EASEMENT NOTE.	15	(N) REMOVAL OF (E) RETAINING WALL, (N) WESTERING WALL, AND (N) WIDENED DRIVEWAY ON WESTERNLY 1921 ECOLL PURSUANT TO OFFER OF EASEMENT FROM THE LUT TRUST, OWNER OF 1921 ECOLL.
	CONTIGUOUS LEMONADE BERRY STAND 0.15 ACRE (OTD OPEN SPACE EASEMENT)	2	RETAIN AND ENHANCE AS PER THE PROJECT HYDROLOGY REPORT (CSA, 2015), (THE STORM WATER CONTROL BERM IN THE UPPER (E) AND (N) DRIVEWAY, AND ADJACENT EXISTING 1925 ECOLL SIDE YARD	16	ALL ROOF DRAINS AND DOWN SPOUTS WILL CONSIST OF SEALED LINES TO THE STORM WATER MANAGEMENT SYSTEM AS PROVIDED IN THE PROJECT HYDROLOGY REPORT (CSA 2015) AND THE PROJECT DRAINAGE AND EROSION CONTROL PLAN (C.L. GRANT/MTI, INC. 2015)
	SOUTHERN COASTAL BLUFF SCRUB - 0.04 ACRE (OTD OPEN SPACE EASEMENT) PRE-EXISTING PRIVATE EASEMENT IN FAVOR OF 1927 ECOLL	3	AREA TO BE OVER EXCAVATED (REMOVE POST LANDSLIDE GRADING) & RECOMPACT PER CSA REPORT, SEE DRAINAGE PLAN FOR ADDITIONAL NOTES IN THIS AREA.	17	EMERGENCY ACCESS SHALL BE AN UNOBSTRUCTED MINIMUM OF 16-FOOT WIDE TO WITHIN 150-FOOT OF RED LINE INDICATES MAXIMUM 5'0" TRAIL DISTANCE FROM FURTHER EXTERIOR WALL.
	(E) JOINT 1925-1927 ECOLL DRIVEWAY PAYMENT	4	IN THIS AREA, SEASONAL SAND BAGS, AND CONCRETE V-DITCH ON 1925 ECOLL TO BE REMOVED AS PART OF (N) DRIVEWAY WIDENING AND VEGETATION FROM 1927 ECOLL ONTO 1925 ECOLL WILL BE TRIMMED TO MAINTAIN MINIMUM 13'-5" (V) CLEARANCE FROM DRIVEWAY.	18	THE 16-FOOT WIDE EMERGENCY ACCESS TO WITHIN 150-FOOT OF RED LINE INDICATES MAXIMUM 5'0" TRAIL DISTANCE FROM FURTHER EXTERIOR WALL.
	(E) JOINT 1925-1927 ECOLL DRIVEWAY	5	(N) DRY STAND PIPE		
	(N) HORIZONTAL LEMONADE BERRY MITIGATION AREA - 0.01 ACRE, INCLUDES RESTORATION OF THE CITY (1975) TODE GRADING AREA	6	LOCATION OF WATER METER		
	OPEN YARD AREA PER SB MUNICIPAL CODE SECTION 28.15.060	7	PROPOSED MOTORIZED SWINGING GATE LOCATE MOTOR TO WEST SIDE OF WESTERLY RETAINING WALL		
	PROPOSED 8" (V) BERM ALONG THE EAST SIDE OF THE 1925 ECOLL WIDENED DRIVEWAY EASTERLY SIDE YARD (1925-1921 ECOLL PL)	8	OUTFALLS IN (N) CURB OF WESTERLY SEWER WATER FROM WATER STORAGE TANKS		
	TOTAL NET FLOOR AREA PROPOSED	9	(E) FIRE HYDRANT D13-002 FLOW RATE = 681 GPM, WITHIN REQUIRED 300' DISTANCE.		
	LOWER LEVEL 1,089 sf	10	10'-0" WIDE SEWER EASEMENT PER BOOK 673 PAGE 210		
	UPPER LEVEL 1,769 sf	11	OR, PLOTTED PER THE LEGAL DESCRIPTION THEREOF.		
	ENTRY LEVEL 330 sf	12	SET LEAD & TAG "PLS 4285"		
	TOTAL HABITABLE FLOOR AREA 3,200 sf	13	PRIVATE OPEN YARD AREA OF AT LEAST 1,250 SF MEASURED AT LEAST 20 FEET LONG BY 20 FEET WIDE.		
	GARAGE 540 sf	14	NOT USED		
	TOTAL NET FLOOR AREA 3,770 sf	15	LOCATION OF THE UPPER TERMINATION (EDGE) OF THE SEWER LINE, SEE THE SEWER EASEMENT AND THE CONTROLLING CRITERIA IN TITLE 14, CALIFORNIA CODE OF REGULATIONS SECTION 13577(h) AND APPLICABLE GUIDANCE PROVIDED BY CALIFORNIA AGRICULTURE COMMISSION GEOLOGICAL SURVEY, THE CALIFORNIA DEPARTMENT OF WATER RESOURCES, THE CALIFORNIA IMPLEMENTING GRADING PERMIT (1984), THE CITY GENERAL PLAN, SAFETY ELEMENT, AND THE CITY GENERAL PLAN SAFETY ELEMENT.		
	DECK AREA	16	LOCATION OF THE UPPER TERMINATION (EDGE) OF THE SEWER LINE, SEE THE SEWER EASEMENT AND THE CONTROLLING CRITERIA IN TITLE 14, CALIFORNIA CODE OF REGULATIONS SECTION 13577(h) AND APPLICABLE GUIDANCE PROVIDED BY CALIFORNIA AGRICULTURE COMMISSION GEOLOGICAL SURVEY, THE CALIFORNIA DEPARTMENT OF WATER RESOURCES, THE CALIFORNIA IMPLEMENTING GRADING PERMIT (1984), THE CITY GENERAL PLAN, SAFETY ELEMENT, AND THE CITY GENERAL PLAN SAFETY ELEMENT.		
	LOWER LEVEL 162 sf	17	LOCATION OF THE UPPER TERMINATION (EDGE) OF THE SEWER LINE, SEE THE SEWER EASEMENT AND THE CONTROLLING CRITERIA IN TITLE 14, CALIFORNIA CODE OF REGULATIONS SECTION 13577(h) AND APPLICABLE GUIDANCE PROVIDED BY CALIFORNIA AGRICULTURE COMMISSION GEOLOGICAL SURVEY, THE CALIFORNIA DEPARTMENT OF WATER RESOURCES, THE CALIFORNIA IMPLEMENTING GRADING PERMIT (1984), THE CITY GENERAL PLAN, SAFETY ELEMENT, AND THE CITY GENERAL PLAN SAFETY ELEMENT.		
	UPPER LEVEL 166 sf	18	LOCATION OF THE UPPER TERMINATION (EDGE) OF THE SEWER LINE, SEE THE SEWER EASEMENT AND THE CONTROLLING CRITERIA IN TITLE 14, CALIFORNIA CODE OF REGULATIONS SECTION 13577(h) AND APPLICABLE GUIDANCE PROVIDED BY CALIFORNIA AGRICULTURE COMMISSION GEOLOGICAL SURVEY, THE CALIFORNIA DEPARTMENT OF WATER RESOURCES, THE CALIFORNIA IMPLEMENTING GRADING PERMIT (1984), THE CITY GENERAL PLAN, SAFETY ELEMENT, AND THE CITY GENERAL PLAN SAFETY ELEMENT.		
	ENTRY LEVEL 222 sf	19	LOCATION OF THE UPPER TERMINATION (EDGE) OF THE SEWER LINE, SEE THE SEWER EASEMENT AND THE CONTROLLING CRITERIA IN TITLE 14, CALIFORNIA CODE OF REGULATIONS SECTION 13577(h) AND APPLICABLE GUIDANCE PROVIDED BY CALIFORNIA AGRICULTURE COMMISSION GEOLOGICAL SURVEY, THE CALIFORNIA DEPARTMENT OF WATER RESOURCES, THE CALIFORNIA IMPLEMENTING GRADING PERMIT (1984), THE CITY GENERAL PLAN, SAFETY ELEMENT, AND THE CITY GENERAL PLAN SAFETY ELEMENT.		
	TOTAL DECK AREA 550 sf	20	LOCATION OF THE UPPER TERMINATION (EDGE) OF THE SEWER LINE, SEE THE SEWER EASEMENT AND THE CONTROLLING CRITERIA IN TITLE 14, CALIFORNIA CODE OF REGULATIONS SECTION 13577(h) AND APPLICABLE GUIDANCE PROVIDED BY CALIFORNIA AGRICULTURE COMMISSION GEOLOGICAL SURVEY, THE CALIFORNIA DEPARTMENT OF WATER RESOURCES, THE CALIFORNIA IMPLEMENTING GRADING PERMIT (1984), THE CITY GENERAL PLAN, SAFETY ELEMENT, AND THE CITY GENERAL PLAN SAFETY ELEMENT.		
	SITE AREA FOR F.A.S. STUDY (B); REQUESTED BY CITY STAFF AT FEBRUARY 22, 2015 SINGLE FAMILY AT SIGN BOARD. AREA REPRESENTS 3,431 sf				

F.A.R. Calculator

Instructions: Enter the information in the white boxes below. The spreadsheet will calculate the proposed FAR (floor area ratio), the 100% max FAR (per the Zoning Ordinance), and the 85% max FAR (per the Zoning Ordinance). Additionally it will determine whether a FAR Modification is required.

The **Net Lot Area** does not include any Public Road Easements or Public Road Right-of-Way areas. The proposed **TOTAL Net FAR Floor Area** shall include the net floor area of all stories of all building, but may or may not include basement/cellar floor area. For further clarification on these definitions please refer to SBMC §28.15.083.

ENTER Project Address:	1925 E.C.D.L.L. - SB, CA 93109
Is there a basement or cellar existing or proposed?	No
ENTER Proposed TOTAL Net FAR Floor Area (in sq. ft.):	3,545

ENTER Zone ONLY from drop-down list:	E-3
ENTER Net Lot Area (in sq. ft.):	3,431
Is the height of existing or proposed buildings 17 feet or greater?	Yes
Are existing or proposed buildings two stories or greater?	Yes
The FAR Requirements are:	REQUIRED**

ENTER Average Slope of Lot:	13.50%
Does the height of existing or proposed buildings exceed 25 feet?	Yes
Is the site in the Hillside Design District?	Yes
Does the project include 500 or more cu. yds. of grading outside the main building footprint?	Yes

An FAR MOD is required per SBMC §28.15

FLOOR AREA RATIO (FAR):	1.033226465
Lot Size Range:	< 4,000 sq. ft.
MAX FAR Calculation (in sq. ft.):	2,200 sq. ft.
100% MAX FAR:	0.641212474
100% MAX FAR (in sq. ft.):	2200
85% of MAX FAR (in sq. ft.):	1870
80% of MAX FAR (in sq. ft.):	1760

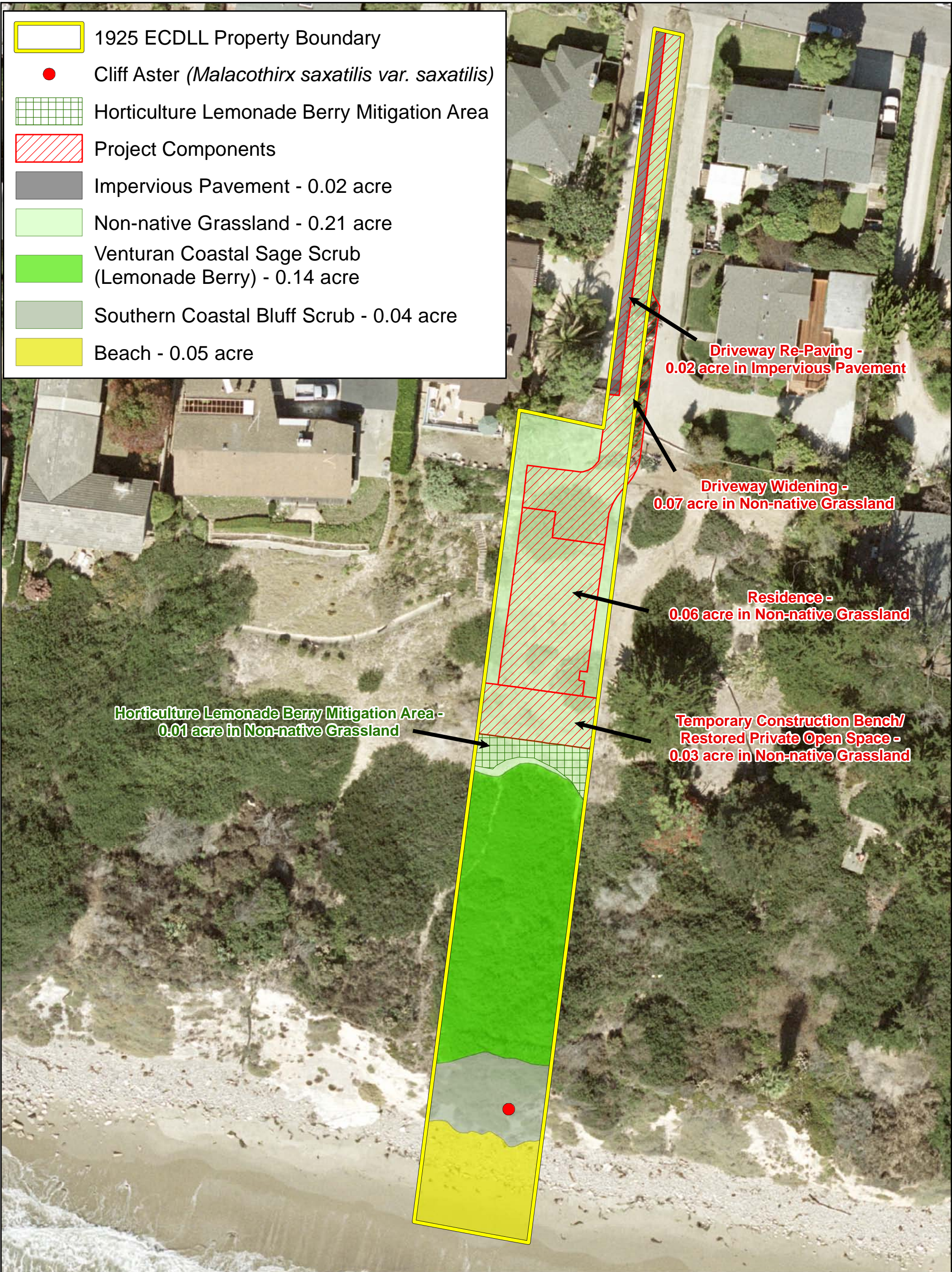
The 3545 square foot proposed total is 162.0% of the MAX FAR.*

* **NOTE:** Percentage total is rounded up.

****NOTE:** If your project is located on a site with multiple or overlay zones, please contact Planning Staff to confirm whether the FAR limitations are "Required" or "Guideline".

Acreage Conversion Calculator

ENTER Acreage to Convert to square footage:	1.00
Net Lot Area (in sq. ft.):	43560



Attachment 2. Project Impact and Mitigation Map

1925 El Camino de la Luz
Santa Barbara County, California



Date: May 2015
Map By: Michael Rochelle
Aerial: November 2011

EXPLANATION

Earth Materials

Qt

Monterey Formation

Active Landslide

Map Symbols

SI-5

LD-3

DH-6

B-3

Stratigraphic bedding orientations collected by Cotton, Shires and Associates, Inc.

Average stratigraphic bedding orientations collected during the logging of large-diameter borings

Bedding orientation on landslide basal rupture surface collected in large-diameter boring

70'

CSA 10' Contour

CSA 2' Contour

CSA 10' Contour (Approximate)

CSA 2' Contour (Approximate)

CSA Survey Point

60

City of Santa Barbara 10' Contour

City of Santa Barbara 2' Contour

All Lines of This Color Indicate Features From City of Santa Barbara Map, Including, but not Limited to: Houses, Fences, Roads, Vegetation and Power Poles

SURVEY LIMITATIONS NOTES

1. This is not a map of a boundary survey. No property corners have been set as part of this work.

2. Survey monuments found in the course of this mapping are set by others, and have been used only as a reference for the purpose of topographic mapping, without our verification of their agreement with applicable legal descriptions and seniority of deeds.

3. Relation of topographic features (i.e., fences, walls, trees, power poles, etc.) to property lines as shown on this map is subject to the adjustments that a boundary survey may require.

4. This survey was prepared without the benefit of a Title Report. Easements, if shown, should be considered approximate in location.

5. If this map is provided in an electronic format as a courtesy to client, delivery of the electronic CAD file does not constitute delivery of a professional work product. The signed paper print delivered with this electronic CAD file constitutes our professional work product and, in the event the electronic CAD file is altered, the print must be referred to for the original and correct survey information. We shall not be responsible for any modifications made to the electronic CAD file or for any products derived from the electronic CAD file which are not reviewed, signed and sealed by us.

General Survey Notes

1) All dashed lines on this map represent features (houses, walls, topography, etc.) that have not been surveyed by Cotton, Shires and Associates and are approximate only.

2. Vertical Datum for CSA topography based on NOAA published value for mean lower low water (MLLW) in Santa Barbara.

3. City of Santa Barbara topography and features taken from map dated 4/10/95 (Revised April 1997) from County of Santa Barbara website (<http://www.countyofsb.org/pwd/water/TopoFloodControl1.htm>).

4. Southern property lines are based on the MHTL elevation of 4.63 feet above MLLW (MHTL from David Skelly, GeoSoils, Inc., "Wave Runup & Coastal Hazard Analysis, 1921 El Camino de la Luz & 1925 Camino de la Luz, Santa Barbara, Santa Barbara County, California").

COTTON, SHIRES AND ASSOCIATES, INC.
CONSULTING ENGINEERS AND GEOLOGISTS

Site Plan and Geologic Map

1925 El Camino De La Luz

APN:045-100-024

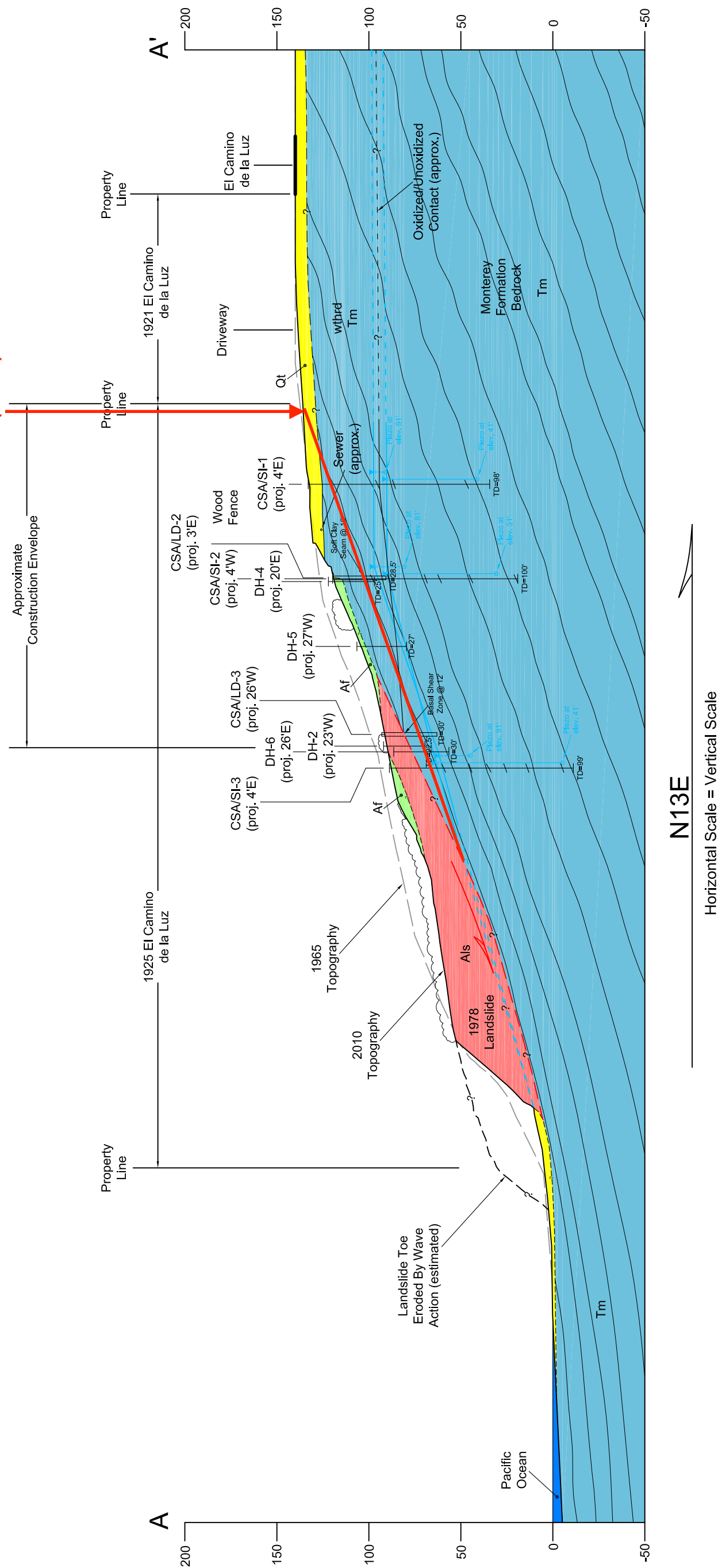
SANTA BARBARA, CALIFORNIA

GEO/ENG BY AM/TPS	SCALE 1"= 60'	PROJECT NO. G0058
APPROVED BY JW	DATE OCTOBER 2012	FIGURE NO. 5

EXHIBIT F1

ATTACHMENT 2 - ANNOTATED CROSS SECTION

**Approximate Dividing
Line Between Static
FS<1.5 (below) and
FS>1.5 (above) and
Seismic FS<1.1 (below)
and FS>1.1 (above)**



N13E

Horizontal Scale = Vertical Scale

EXHIBIT F2



COTTON, SHIRES AND ASSOCIATES, INC.
CONSULTING ENGINEERS AND GEOLOGISTS

Engineering Geologic Cross Section A-A'

1925 El Camino De La Luz
APN:045-100-024

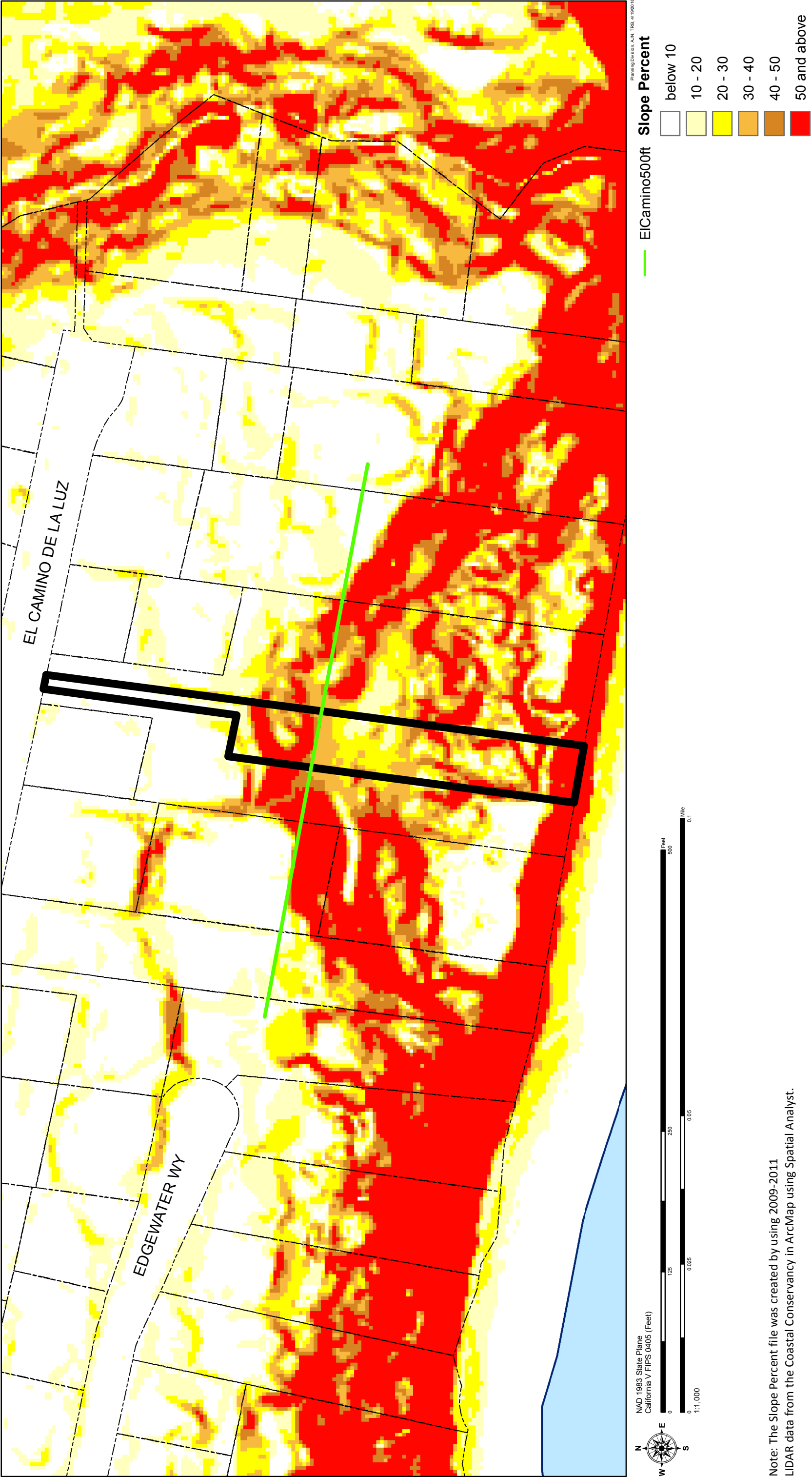
SANTA BARBARA, CALIFORNIA

ENGINEER BY	SCALE	PROJECT NO.
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1"=60'

3	3	3
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95	95	95
96	96	96
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99	99	99
100	100	100

SLOPE ALONG EL CAMINO DE LA LUZ



Note: The Slope Percent file was created by using 2009-2011 LIDAR data from the Coastal Conservancy in ArcMap using Spatial Analyst.

Source: <https://coast.noaa.gov/dataviewer/index.html?redirect=301ocm&action=advsearch&qType=in&qFld=projectid&qVal=1005#>

**RESIDENTIAL REUSE, CONSERVATION, AND PUBLIC ACCESS PROJECT
1925 EL CAMINO DE LA LUZ, SANTA BARBARA 93109**

PROJECT CONSTRAINTS/CONSISTENCY ANALYSIS

4. PROJECT ALTERNATIVES ANALYSIS

The Project team considered five project alternatives, in addition to the proposed Project and the “no project” alternative, during Project formulation and analysis: (1) *in situ* replacement of the pre-1978 landslide house, on a deep foundation and with landform stabilization, including the SWMS BMP's; (2) a one-story 1,000 sf house in the upper level location of the proposed house, with the garage, entry, and driveway/turn-around as shown on the plans for the proposed Project; (3) the proposed house with the garage located to the north of the lower driveway; (4) a cantilevered house suspended from caissons and beams in the lower driveway segment of the parcel and located south of the MTLs; and (5) alternative agricultural or group home uses that generally are allowed by the LCP Zoning Ordinance in the E-3 zoning district in which the Parcel is located.

(4.1.) *In situ* House Replacement. Implementation of the first alternative would (1) preclude the restoration of public views from the street to the Santa Barbara Channel and a considerable part of Santa Cruz Island, (2) require extension of the lower shear pin tie-backs beneath the MTLs and onto adjacent property on 1927 El Camino de la Luz that is not owned by others, and (3) produce a house with 1/3 less habitable space than the proposed residence. For reasons of inconsistency with the applicable City LCP, General Plan, and Municipal Code, view blockage, the necessary off-site location of a critical landform stabilization component, and proportionately increased per square foot costs of the Project, Alternative 1 is considered to be infeasible.

(4.2) 1,000 sf Small House Alternative. The second alternative would (1) reduce the habitable space of the house by 2/3, (2) proportionately increase the per square foot costs of the Project, while (3) reducing its quality of life value, (3) expose >14 feet (vertical) of the house foundation and/or lower shear pins, and (4) require walls up to that height along the east and west sides below the lower level of the house to screen them. For reasons of inconsistency with the applicable City LCP, General Plan, and Municipal Code, neighborhood incompatibility, and visual impacts, the minimum likely doubling in per-foot construction cost of the project and the diminished quality of life afforded by a 1,000 ft² house in comparison to the proposed 3,100 ft² habitable space, Alternative 2 is considered to be infeasible.

(4.3) Garage Location Alternative. The third alternative, which locates the garage in the proposed turnaround area to the northwest of the house, would (1) unavoidably reduce the turn-around vehicular maneuvering space on the driveway apron to below Municipal Code standards, or (2) in the alternative require extension of the structural development envelope to the south, with resultant intrusion in the proposed public view corridor from El Camino de la Luz to the Santa Barbara Channel. For reasons of inconsistency with the applicable City LCP, and Municipal Code, and neighborhood incompatibility, Alternative 3 is considered to be infeasible.

**RESIDENTIAL REUSE, CONSERVATION, AND PUBLIC ACCESS PROJECT
1925 EL CAMINO DE LA LUZ, SANTA BARBARA 93109**

PROJECT CONSTRAINTS/CONSISTENCY ANALYSIS

(4.4.) Cantilevered House Alternative. The fourth alternative would suspend a light-weight house from horizontal beams that extend south from deep caissons in the parcel's 12.5 feet driveway segment and over the MTLs easement. A tandem two-car garage and entry would be located above the beams adjacent to the lower driveway area. Such a beam-suspended structure could be located at or below elevation 130-132 feet MLLW, or alternately, if built on/above the beams, extend vertically to at least elevation 140-144 feet MLLW, depending on roof design. Similar cantilevered houses have been constructed elsewhere; additional caissons may be necessary in the Monterey Formation that underlies the driveway. In either version, there would be no landform stabilization shear pins on the post-1978 landslide City (1978) and Doolittle (1984) graded slope near elevation 90, and thus no restoration of the Factor of Safety (FS 1.5 static, FS 1.1-1.2 seismic) in the landslide- and grading-impacted area, with a resultant continued unstabilized manufactured hillside on the Parcel.

Both the above- and below-beam sub-alternatives would (1) be elongated, narrow, and boxy, thus potentially less than fully consistent with the existing single family neighborhood residential character, (2) substantially block the public view from the street toward the Santa Barbara Channel either in the above-grade house configuration or by the tandem garage and entry, or both, and (3) add an additional prominently elevated structure to the line of existing structure to the west and east of the Parcel that are now part of the view shed from the lower beach plane, looking landward. For reasons of inconsistency with the applicable public view standards, neighborhood community character, construction impact minimization, and reduced landform stability protection provisions of the LCP, General Plan, and Municipal Code, alternative 3 is considered to be infeasible.

(4.5) Other Land Uses. The Municipal Code (LCP Zoning Ordinance) generally authorizes two other land uses in the E-3 zoning district for parcels the size of the Project site: agriculture and group homes. However, the lack of soils, the less than 0.5 acre parcel size, landslide-impacted sloping terrain, absence of an available or affordable on-site water supply for commercial agricultural irrigation, and proximity of houses on the adjacent parcels render both in-ground and greenhouse agricultural use of the parcel infeasible. Similarly, the size, driveway geometry, reciprocal driveway easement limitations, and sloping terrain render the parcel unsuitable for group home development, parking, or emergency vehicle access.

(4.6) No Project Alternative. In the absence of purchase at fair market value of the Parcel by the City (or another public agency), the "no project" alternative would (1) preclude the Emprise Trust's lawful economic use of the parcel, (2) deny its constitutionally protected, substantial investment-backed right to such use, and forego (3) the proposed increased landform stability that benefits both private property and the MTLs, (4) dedication of the lateral beach public access easement, (5) dedication of the proposed public view corridor over the parcel, with

**RESIDENTIAL REUSE, CONSERVATION, AND PUBLIC ACCESS PROJECT
1925 EL CAMINO DE LA LUZ, SANTA BARBARA 93109**

PROJECT CONSTRAINTS/CONSISTENCY ANALYSIS

continued substantially blocked public views from the street to the Channel and Island, and (6) dedication of the coastal bluff and contiguous lemonade berry vegetation open space easement.

The proposed Project, as described in section 3, thus constitutes the regulatory standards-consistent and environmentally preferred alternative residentially developed use of the parcel.



1925 EL CAMINO DE LA LUZ RESIDENCE (MST#2013-00240)
MITIGATION MONITORING AND REPORTING PROGRAM

June 22, 2016

PROJECT LOCATION

The project site address is 1925 El Camino de la Luz, located south of El Camino de la Luz, north of Pacific Ocean, in the Mesa neighborhood of the City of Santa Barbara

PROJECT DESCRIPTION

The project proposal is for development of a 2,789 square foot (net) stepped three-story single-family residence (2,096 square-foot lot coverage, 30 foot maximum height). Associated project improvements would include a two-car garage (571 net square feet), private open space (3,152 square feet), driveway widening and restoration, hardscape and infrastructure improvements, three water storage tanks/ lap pool; drainage and storm water/water quality management system, utility connections, and native vegetation restoration and landscaping.

The development would entail initial demolition and removal of some existing infrastructure and debris (e.g., concrete paving and fencing to be replaced, landslide debris removal), and site stabilization and foundation design utilizing deep caissons into bedrock, shear-pins, and tie backs (drilled and poured in place construction). The project includes offers to dedicate to the City a lateral public recreational access easement across the back beach area of the parcel, an open space easement on the undeveloped portion of the property including slope and native lemonade berry vegetation area south of the development, and an air space public view corridor easement from El Camino de la Luz over the residence toward the Santa Barbara Channel, and access to retained storm water for municipal (non-potable) use. The duration of the demolition, grading, and construction process is estimated at 1.3 years.

PURPOSE

The purpose of the Mitigation Monitoring and Reporting Program (MMRP) for the 1925 El Camino de la Luz project is to ensure compliance with all mitigation measures identified in the project environmental review documents (Initial Study and Mitigated Negative Declaration) to avoid or lessen potentially significant adverse environmental impacts resulting from the proposed project. The implementation of this MMRP shall be accomplished by project developer and their representative, and confirmed by City staff.

The program shall apply to the following phases of the project:

- Plan and specification preparation
- Pre-construction conference
- Construction of the site improvements
- Post Construction

I. RESPONSIBILITIES AND DUTIES

A qualified representative of the developer, approved by the City Planning Division and paid for by the developer, shall be designated as the Project Environmental Coordinator (PEC). The PEC shall be responsible for assuring full compliance with the provisions of this mitigation monitoring and reporting program to the City. The PEC shall have authority over all other monitors/specialists, the contractor, and all construction personnel for those actions that relate to the items listed in this program.

It is the responsibility of the owner and contractor to comply with all mitigation measures listed in the attached MMRP matrix. Any problems or concerns between monitors and construction personnel shall be addressed by the PEC and the contractor. The contractor shall prepare a construction schedule subject to the review and approval of the PEC. The contractor shall inform the PEC of any major revisions to the construction schedule at least 48 hours in advance. The PEC and contractor shall meet on a weekly basis in order to assess compliance and review future construction activities.

II. PRE-CONSTRUCTION BRIEFING

The PEC shall prepare a pre-construction project briefing report. The report shall include a list of all mitigation measures and a plot plan delineating all sensitive areas to be avoided. This report shall be provided to all construction personnel.

The pre-construction briefing shall be conducted by the PEC. The briefing shall be attended by the PEC, construction manager, consultants as applicable, Planning Division Case Planner, Public Works representative and all contractors and subcontractors associated with the project. Multiple pre-construction briefings shall be conducted as the work progresses and a change in contractor occurs.

The MMRP shall be presented to those in attendance. The briefing presentation shall include project background, the purpose of the MMRP, duties and responsibilities of each participant, communication procedures, monitoring criteria, compliance criteria, filling out of reports, and duties and responsibilities of the PEC and project consultants.

It shall be emphasized at this briefing that the PEC and project consultants have the authority to stop construction and redirect construction equipment in order to comply with all mitigation measures.

Once construction commences, field meetings between the PEC and project consultants, and contractors shall be held on an as-needed basis in order to create feasible mitigation measures for unanticipated impacts, assess potential effects, and resolve conflicts.

II. IMPLEMENTATION PROCEDURES

There are three types of activities which require monitoring. The first type pertains to the review of the Conditions of Approval and Construction Plans and Specifications. The second type relates to construction activities and the third to any ongoing monitoring activities during operation of the project.

A. MONITORING PROCEDURES

The PEC and required consultant(s) shall monitor all field activities. The authority and responsibilities of the PEC and consultant(s) are described in the previous section.

B. REPORTING PROCEDURES

The following three (3) types of reports shall be prepared:

1. Schedule

The PEC and contractor shall prepare a monthly construction schedule to be submitted to the City prior to or at the pre-construction briefing.

2. General Progress Reports

The PEC shall be responsible for preparing written progress reports submitted to the City. These reports would be expected on a bi-weekly basis during grading, excavation and construction, activities. The reports would document field activities and compliance with project mitigation measures, such as for dust control and sound reduction.

3. Final Report

A final report shall be submitted to the Planning Division when all monitoring (other than long-term operational measures) has been completed and shall include the following:

- a. A brief summary of all monitoring activities.
- b. The date(s) the monitoring occurred.
- c. An identification of any violations and the manner in which they were dealt with.
- d. Any technical reports required, such as noise measurements.
- e. A list of all project mitigation monitors.

IV. MMRP MATRIX

The following MMRP Matrix describes each initial study mitigation measure and parties responsible for implementation, along with the timing and provides a checklist for monitoring and reporting activities.

The MMRP Matrix is intended to be used by all parties involved in monitoring the project mitigation measures, as well as project contractors and others working in the field. The Matrix should be used as a compliance checklist to aid in compliance verification and monitoring requirements. A copy of the MMRP matrix shall be kept in the project file as verification that compliance with all mitigation measures has occurred.

V. TECHNICAL REPORT RECOMMENDATIONS

The recommendations from the technical reports referenced in the MMRP matrix are attached. Attachment 1: Biological Reconnaissance Report & Update (WRA Environmental Consultants, June 2012, April 2015); Attachment 2: Geologic and Geotechnical Investigation (Cotton, Shires & Associates, October 2012); and Attachment 3: Hydrology Report (Cotton, Shires & Associates, June 2015).

1925 EL CAMINO DE LA LUZ RESIDENCE PROJECT (MST#2013-00240)
MITIGATION MONITORING AND REPORTING PROGRAM MATRIX

MITIGATION MEASURE	PARTIES RESPONSIBLE FOR IMPLEMENTATION	VERIFICATION		
		DATE	ACCOMPLISHED	COMMENTS
VISUAL RESOURCES				
<i>Visual Resources Recommended Measure</i>	Owner/Applicant			
V-1 <i>Lighting Design.</i> The applicant shall submit a detailed project lighting plan for approval by Single Family Design Board as part of the project preliminary and final design review approvals.				
BIOLOGICAL RESOURCES				
<i>Biological Resources Mitigation</i>	Owner/Applicant			
B-1 <i>Bird Nesting.</i> Removal of vegetation shall be avoided during the bird nesting season (February 15 to September 15) where feasible, or a qualified biologist shall conduct a nesting bird survey prior to removal of vegetation scheduled to occur from February 15 through September 15. If nesting is found, a qualified biologist shall establish a protective buffer around the nest as needed, and the vegetation shall not be removed until after the young have fledged.	Owner/Applicant Construction Contractor			
<i>Biological Resources Recommended Measure</i>	Owner/Applicant			
B-2 <i>Habitat Restoration and Landscaping.</i> Final project plans approved by the Single Family Design Board and shall include project components to implement measures identified by project biologist reports for restoring native species vegetation following project construction and providing compatible landscaping. Final restoration and landscape plans will incorporate biologist-recommended measures for plant species, locations and timing for planting vegetation; local source for native plant species; erosion control, initial irrigation, and other establishment measures; performance criteria; and monitoring and demonstration of establishment success (two years for private open space and lemonade berry mitigation; five years for coastal bluff scrub) with final measures approved by the City prior to issuance of grading and building and occupancy permits.	Owner/Applicant Construction/Landscape /Biologist Contractors			

1925 EL CAMINO DE LA LUZ RESIDENCE PROJECT (MST#2013-00240)
MITIGATION MONITORING AND REPORTING PROGRAM MATRIX

MITIGATION MEASURE	PARTIES RESPONSIBLE FOR IMPLEMENTATION	VERIFICATION		
		DATE	ACCOMPLISHED	COMMENTS
GEOLOGY AND SOILS				
Geology and Soils Mitigation G-1 Slope Stability and Erosion Control. Final project plans will incorporate measures recommended by project geology reports to ensure long-term slope stability and erosion control, and measures recommended by project geology reports to ensure short-term stability and erosion control during the site preparation and construction process, with final measures approved by the City prior to issuance of grading and building permits.	Owner/Applicant Construction Contractor Geologist Contractor			
NOISE				
Noise Mitigation N-1 Construction Hours. Higher noise-generating construction equipment and activities (use of jackhammers, drilling for caissons, etc.) shall only be permitted Monday through Friday between the hours of 7:00 a.m. and 4:00 p.m. Construction is prohibited on the following holidays: New Year's Day (January 1 st); Martin Luther King Jr Day (3 rd Monday in January); President's Day (3 rd Monday in February); Memorial Day (Last Monday in May); Independence Day (July 4 th); Labor Day (1 st Monday in September); Thanksgiving Day (4 th Thursday in November); Day Following Thanksgiving Day (Friday following Thanksgiving); Christmas Day (December 25 th). <i>*When a holiday falls on a Saturday or Sunday, the preceding Friday or following Monday respectively shall be observed as a holiday.</i> When, based on required construction type or other appropriate reasons, it is necessary to do work outside the allowed construction hours, contractor shall contact the City to request a waiver from the above construction hours, using the procedure outlined in Santa Barbara Municipal Code §9.16.015 Construction Work at Night. Contractor shall notify all residents within 300 feet of the parcel of intent to carry out said construction a minimum of 48 hours prior to said construction. Said notification shall include what the work includes, the reason for the work, the duration of the proposed work and a contact number.	Owner/Applicant Construction Contractor			

1925 EL CAMINO DE LA LUZ RESIDENCE PROJECT (MST#2013-00240)
MITIGATION MONITORING AND REPORTING PROGRAM MATRIX

MITIGATION MEASURE	PARTIES RESPONSIBLE FOR IMPLEMENTATION	VERIFICATION		
		DATE	ACCOMPLISHED	COMMENTS
NOISE (CONTINUED)				
Noise Mitigation				
N-2 Construction Equipment Sound Control. All construction equipment, including trucks, shall be professionally maintained and fitted with standard manufacturers' muffler and silencing devices.	Owner/Applicant Construction Contractor			
Noise Mitigation				
N-3 Neighborhood Notification Prior to Construction. At least twenty (20) days prior to commencement of the project construction process, the contractor shall provide written notice to all property owners, businesses, and residents within 300 feet of the project area. The notice shall contain a description of the project, the construction schedule, including days and hours of construction, the name and phone number of the Project Environmental Coordinator (PEC) and Contractor(s), site rules and Conditions of Approval pertaining to construction activities, and any additional information that will assist the Building Inspectors, Police Officers and the public in addressing problems that may arise during construction.	Owner/Applicant Construction Contractor			
Noise – Recommended Measure				
N-4 Construction Hours Limitations. Requirements in mitigation measure N-1 are superseded by the following provisions: All construction activities shall be prohibited on weekends and shall be permitted only on weekdays between the hours of 8:30 a.m. and 4:00, with the exception of ten specified holidays when construction activities shall also be prohibited: New Year's Day (January 1 st); Martin Luther King Jr Day (3 rd Monday in January); President's Day (3 rd Monday in February); Memorial Day (Last Monday in May); Independence Day (July 4 th); Labor Day (1 st Monday in September); Thanksgiving Day (4 th Thursday in November); Day Following Thanksgiving Day (Friday following Thanksgiving); Christmas Day (December 25 th). *When a holiday falls on a Saturday or Sunday, the preceding Friday or following Monday respectively shall be observed as a holiday.	Owner/Applicant Construction Contractor			

MITIGATION MEASURE	PARTIES RESPONSIBLE FOR IMPLEMENTATION	VERIFICATION		
		DATE	ACCOMPLISHED	COMMENTS
NOISE (CONTINUED)				
Noise – Recommended Measure N-5 Construction Equipment Sound Controls. Requirements in mitigation measure N-2 are further specified as follows: Equipment and vehicle mufflers and silencing devices shall be operating whenever equipment and vehicles are in use for the project. All diesel equipment shall be operated with closed engine doors. Unnecessary idling of internal combustion engines shall be prohibited during project construction processes. Whenever feasible, electrical power shall be used to run air compressors and similar power tools.	Owner/Applicant Construction Contractor			
Noise – Recommended Measure N-6 Neighbor Notification. Requirements in mitigation measure N-3 are augmented as follows: Additional notification of neighbors within 300 feet of the project area shall be provided one week prior to a changed construction schedule. A sign (with minimum font size of 0.5 inch) with the information required by mitigation measure N-1 shall be posted at the point of entry to the site immediately upon building permit issuance and upon any subsequent update notifications.	Owner/Applicant Construction Contractor			
Noise – Recommended Measure N-7 Construction Noise Barriers. Stationary construction equipment that generates noise exceeding 50 dBA at the property boundary shall be shielded with a barrier that meets a sound transmission class (STC) rating of 25. Air compressors and generators used for construction shall be surrounded by temporary acoustical shelters.	Owner/Applicant Construction Contractor			
Noise – Recommended Measure N-8 Building Crack Video. Prior to commencement of construction processes, the project permittee shall provide for prior two-week notification of neighbors and video documentation of existing cracks in buildings and other structures within 300 feet of the project site, and shall submit it to the City of Santa Barbara. Prior to issuance of certificate of occupancy, the project permittee shall provide for prior two-week neighbor notification and video documentation of post-construction condition of buildings and other structures, and shall compensate any neighbors for repair of cracks caused by the construction process.	Owner/Applicant Construction Contractor			

MITIGATION MEASURE	PARTIES RESPONSIBLE FOR IMPLEMENTATION	VERIFICATION		
		DATE	ACCOMPLISHED	COMMENTS
WATER QUALITY/HYDROLOGY				
<i>Water Quality/Hydrology – Recommended Measure</i> WQH-1 Drainage and Storm Water Management. Final project plans shall incorporate project components for temporary construction erosion and sediment control and water quality facilities and operations, and post-construction permanent drainage and storm water management facilities and operation/maintenance provisions. Approved drainage and storm water facilities and operations/maintenance provisions shall reflect technical study recommendations and be consistent with City policies, ordinances, and guidelines for construction erosion and sediment control, and permanent storm water management addressing water volumes and water quality.	Owner/Applicant Construction Contractor			

1925 EL CAMINO DE LA LUZ RESIDENCE (MST#2013-00240)
MITIGATION MONITORING AND REPORTING PROGRAM
June 22, 2016

Recommendations from
Biological Reconnaissance Report (June 2012) and
Biological Reconnaissance Report Update (April 30, 2015)
Prepared by WRA Environmental Consultants, Inc.

RECOMMENDATIONS

6.0 RECOMMENDATIONS

WRA recommends that the 1925 El Camino de la Luz parcel restoration and residential reuse project incorporate the following suite of enhancement and conservation measures as part of the project description (e.g., in the regulatory permit application) and as specific project implementation components. The purpose of these specific recommendations is to document, and assure as a matter of project development and use, that the project in fact (demonstrably) will have no significant adverse direct, indirect, or cumulative effects on protected biological resources.

6.1 Private Open Space Areas Upslope of the House

Private open space areas between the house and the driveway, and along the east side of the driveway, may be planted with non-invasive and drought-tolerant horticultural species, although locally or regionally genetic native vegetation that meets Fire Department fuel load standards (e.g., can be mowed or trimmed) is preferred. In-ground plants should be planted or seeded, in suitably prepared planting pockets on the restored hillside slope, prior to the start of the local rainy season. Irrigation, if any, should be strictly limited to plants set in containers and sufficiently sized impermeable water retaining bases. Drip irrigation, with automatic shut-off valves, only from on-site beneficial reuse water tank(s) should be allowed only during periods of extended drought or plant establishment. Table 2 contains the recommended species list for this project component; these plants are locally or regionally available from native plant nurseries. Figure 9, the Restoration and Residential Reuse Project Vegetation Plan, illustrates the approximated planting zone for these species. If desired, a local landscape architect may be retained to quantify the number of respective plants required for, and to oversee rigorous implementation of, the Vegetation Plan.

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Table 2. Recommended species for use in areas upslope of the house.

Species	Common Name
Grasses and Herbs	
<i>Achillea millefolium</i>	yarrow
<i>Epilobium canum</i>	California fuchsia
<i>Euthamia occidentalis</i>	western goldenrod
<i>Fragaria californica</i>	California strawberry
<i>Iris douglasiana</i>	Douglas iris
<i>Melica imperfecta</i>	chaparral melica
<i>Muhlenbergia rigens</i>	deergrass
Shrubs	
<i>Artemisia californica</i>	California sage
<i>Encelia californica</i>	coast sunflower
<i>Eriophyllum confertiflorum</i>	golden yarrow
<i>Keckiella cordifolia</i>	climbing penstemon
<i>Salvia leucophylla</i>	purple sage

6.2 Private Open Space Areas Downslope of the House

The restored slope (private open space) below the house and upslope from the contiguous lemonade berry stand should be prepared and planted with low stature native vegetation consistent with applicable fire safety objectives to avoid the need for irrigation of the restored hillside slope. Table 3 contains the recommended species list for this project component, which are locally or regionally available from native plant nurseries. Replacement lemonade berry shrubs for the three shrubs located within the development envelope should be planted in a suitable location relative to the existing contiguous lemonade berry stand. Figure 9, the Restoration and Residential Reuse Project Vegetation Plan, illustrates the approximated planting zone of this area. If desired, a local landscape architect may be retained to quantify the number of respective plants required for, and to oversee rigorous implementation of, the Vegetation Plan. The replacement lemonade berry shrub should be photo-documented within 15 days of planting, with a concise

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monitoring report to be sent electronically within 5 working days thereafter to the City Planning Division, WRA, and Dall & Associates.

Table 3. Recommended species for use in areas downslope of the house

Species	Common Name
Grasses and Herbs	
<i>Achillea millefolium</i>	yarrow
<i>Eschscholzia californica</i>	California poppy
<i>Euthamia occidentalis</i>	western goldenrod
<i>Fragaria californica</i>	California strawberry
<i>Melica imperfecta</i>	chaparral melica
Shrubs	
<i>Artemisia californica</i>	California sage
<i>Encelia californica</i>	coast sunflower
<i>Eriogonum fasciculatum</i>	California buckwheat
<i>Eriophyllum confertiflorum</i>	golden yarrow
<i>Hazardia squarrosa</i>	sawtooth goldenbush
<i>Isocoma menziesii</i>	coastal goldenbush
<i>Mimulus aurantiacus</i>	sticky monkeyflower
<i>Rhus integrifolia</i>	lemonade berry
<i>Salvia leucophylla</i>	purple sage

6.3 Pre-Construction Bird Nesting Survey

Although no nesting birds were observed in the contiguous lemonade berry stand or in other vegetation on the parcel during the 2010 and 2011 biological reconnaissance site visits, a pre-construction/pre-grading nesting survey of the contiguous lemonade berry stand and the Southern coastal bluff scrub vegetation should be performed by a qualified biologist if ground disturbance is proposed within 100 feet of the contiguous lemonade berry stand on the parcel during the nesting bird season (February 1 – August 31). If ground disturbance begins outside of this

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window no pre-construction survey is needed. If an active nest is located, a suitable buffer should be established specific to the species, the size of which is to be determined by a qualified biologist. No ground disturbance should occur within that buffer until the young in the nest have fledged. This will avoid any potential impacts on avian species that may, following this biological reconnaissance report and City regulatory permit issuance, be nesting on the parcel. An electronic copy of the nesting survey should be transmitted to the City within 5 working days following its completion.

6.4 Pre-Construction Monarch Roost Survey

Several large trees are present on the adjacent property to the east (1921 ECDLL) that have the potential to serve as a monarch butterfly roost. Although no monarchs have been observed roosting in the trees and there is not a documented occurrence known from the site, there is a documented occurrence within a quarter mile. Therefore, if construction activities within 100 feet of the trees on adjacent 1921 ECDLL are scheduled from October through February, a monarch winter roost survey is recommended. If any tree within this radius is found to serve as a monarch roost, a qualified biologist will confer with City and California Department of Fish and Game (CDFG) staff to coordinate implementation of applicable significant impact avoidance measures from the restoration and residential reuse project at 1925 ECDLL. Potential mitigation measures include, but are not limited to, limiting project construction to activities to those greater than 100 feet from the roost, installing noise barriers between the construction area and the roost trees to reduce construction noise reaching the roost, having a full-time biological monitor watch the roost during construction activities to observe if disturbance to the monarchs is occurring in which case construction would be postponed until the roost was abandoned.

6.5 Southern Coastal Bluff Scrub

During the 75-year economic life of the project, photo monitoring and reporting of the Southern coastal bluff scrub vegetation community on the coastal bluff should be performed and reported to the City prior to the start of construction of the restoration and residential reuse project and thereafter on the 1st-5th, 7th, 10th, and subsequent decadal anniversary dates of City discretionary project approval. The photo documentation shall consist of high resolution color photo imagery from the following photo origination points and along the following headings: (1) From

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the southeasterly parcel corner (at the mean high tide line on the beach, as shown by CSA on its September, 2011 topographic survey map), looking north toward the coastal bluff; (2) From a point 25 feet west of the southeasterly corner of the parcel (at the mean high tide line on the beach, as shown by CSA on its September, 2011 topographic survey map), looking north toward the coastal bluff; (3) From the southwesterly parcel corner (at the mean high tide line on the beach, as shown by CSA on its September, 2011 topographic survey map), looking north toward the coastal bluff; (4) From the toe of the coastal bluff at the easterly property line of the parcel, looking west; (5) From the toe of the coastal bluff at the westerly property line of the parcel, looking east; (6) From the top of the coastal bluff along the westerly parcel boundary, as shown by CSA on its September, 2011 topographic survey map, looking east; and (7) From the top of the coastal bluff along, or near, the easterly parcel boundary, as shown by CSA on its September, 2011 topographic survey map, looking west. No storm water drain lines should discharge to, or be located in or on, the Southern coastal bluff scrub vegetation community on the parcel. Any significant changes in the coastal bluff scrub (involving gain or loss of $\geq 20\%$ in native vegetation coverage on the coastal bluff face, relative to the coverage shown on Figure 8) should be noted and photo-documented on the monitoring report. An electronic copy of the report and photo documentation should be transmitted to the City, WRA, and D&A within 15 working days following its completion.

6.6 Tree Planting

No trees should be planted or allowed to become established on the parcel below the elevation of the proposed lower shear pin row (CSA, 2012), to avoid new loading and potential destabilization of the restored hillside.

6.7 Invasive Exotic Vegetation

Colonizing invasive exotic vegetation (including, but not limited to, pampas grass and ice-plant) should be removed from the parcel prior to the start of grading or construction. Species to be removed include those on the California Invasive Plant Council (Cal-IPC) "High" and "Moderate" list (Cal-IPC 2006). Removal of invasive exotic vegetation from the parcel should be photo-documented within 15 days of its completion, with a concise monitoring report to be sent electronically within 5 working days thereafter to the City Planning Division, WRA, and D&A.

RECOMMENDATIONS

6.8 Contiguous Lemonade Berry Fuel Load Management

Consistent with the fuel load management requirements of the City's Fire Code (Chapter 8, Municipal Code), non-mechanical management of lemonade berry basal detritus for fire safety shall be performed consistent with conservation of the adjacent coastal bluff scrub vegetation pursuant to the following recommended criteria: (1) care should be taken to prevent impacting living lemonade berry plants, (2) detritus should be removed by hand or using non-mechanized hand tools, (3) detritus should be removed during the non-breeding season (September 1 to January 31) to prevent potential impacts to breeding birds, and (4) photo-point/area-specific monitoring and reporting should be sent electronically, within 5 working days following its completion, to the City Planning Division, WRA, and D&A.

6.9 Rodent Control

Rodents that are presently burrowing into the weathered City (1978) grading envelope should be controlled through best management practices to avoid, to the maximum extent feasible, the establishment of new burrows or tunnels that may function to infiltrate water into the Monterey Formation.

Native Vegetation and Mitigation Monitoring

In response to City preliminary review team staff query about the appropriate length of recommended post-project completion biological resources monitoring, WRA, on the basis of the evolved project description (including, but not limited to, the Hydrology Report [CSA, 2015]) clarifies its recommendation in the 2012 Report as follows:

(a) **Section 6.2, Private Open Space Areas Downslope of the House and Horticultural Lemonade Berry Mitigation Area** (2012 Report, pp. 26-27)

The restored slope (private open space) below the house and upslope from the contiguous lemonade berry stand should be prepared and planted with low stature native vegetation consistent with applicable fire safety objectives to avoid the need for irrigation of the restored hillside slope. Table 2 contains the recommended species list for this project component, which are locally or regionally available from native plant nurseries. Replacement lemonade berry shrubs for the three shrubs located within the development envelope should be planted in a suitable location relative to the existing contiguous lemonade berry stand. Planting should occur concurrent with the onset of the fall rainy season to minimize the need for irrigation during the establishment period. Figure 9, the Restoration and Residential Reuse Project Vegetation Plan, illustrates the mitigation planting zones in HR subcatchments 18 (primary), 17, and 5 (secondary, as necessary). If desired, a local landscape architect may be retained to further quantify the number of respective plants required for, and to oversee rigorous implementation of, the Vegetation Plan. The replacement lemonade berry shrubs should (1) be photo-documented within 15 days of planting, and (2) two (2) years after planting, to document establishment success, with a concise monitoring report to be sent electronically within five (5) working days thereafter to the City Planning Division, WRA, and Dall & Associates.

(b) **Section 6.5 Southern Coastal Bluff Scrub** (2012 Report pp. 28-29)

Photo monitoring and electronic reporting of the condition of the Southern coastal bluff scrub vegetation community on the coastal bluff should be performed (1) prior to the start of construction or grading, whichever comes first, of the restoration and residential reuse project, and thereafter (2) on the 1st anniversary of the issuance of the Occupancy Permit for the project, (3) following the occurrence of a rain storm event greater than 6.71 inches/24 hours at Santa Barbara County measurement station 234 within the first five years following the completion of planting, and (4) following the occurrence of any substantial (>100 sf) erosion or other loss of native vegetation on the coastal bluff within the first five years of planting. The photo documentation shall consist of color photo imagery from the following photo origination points and along the following directions: (1) From the southeasterly parcel corner (at the mean high tide line on the beach, as shown on the project topographic survey map), looking north toward the coastal bluff; (2) From a point 25 feet west of the southeasterly corner of the parcel (at the mean high tide line on the beach, as shown on said map), looking north toward the coastal bluff; (3) From the southwesterly parcel corner (at the mean high tide line on the beach, as shown on said map), looking north toward the coastal bluff. Any significant changes in the coastal bluff scrub (involving gain or loss of $\geq 10\%$ in native vegetation coverage on the coastal bluff face, relative to the coverage shown on Figure 8 of our 2012 Report) should be noted and photo-documented on the monitoring report. An electronic copy of the report and photo documentation should be transmitted to the City, WRA, and D&A within five (5) working days following its completion.

1925 EL CAMINO DE LA LUZ RESIDENCE (MST#2013-00240)
MITIGATION MONITORING AND REPORTING PROGRAM

June 22, 2016

Recommendations from
Geologic and Geotechnical Investigation (October 12, 2012)
Prepared by Cotton, Shires and Associates, Inc.

6.0 GEOTECHNICAL DESIGN RECOMMENDATIONS

6.1 Foundation Design Considerations

The principal factors affecting foundation selection are the variable thickness of landslide debris underlying the downslope side of the residential reuse area on the subject parcel, the weaker weathered bedrock, and the potentially weaker bedding planes of both the unweathered and weathered bedrock. We have provided recommendations for protecting the proposed residential reuse envelope (which is primarily upslope of the 1978 landslide) with two (upper and lower) rows of shear pins designed to minimize potential landslide impacts. The lower row of shear pins will include one row of tiebacks, whereas the upper row will not need to be equipped with tiebacks. The upper shear pin row is shown to be at approximate elevation 113 feet, but can be moved upward or downward slightly to accommodate the residence foundation layout (see Figures 7 and 8, Conceptual Slope Stabilization Plan and Conceptual Slope Stabilization Cross Section A-A', respectively). In addition, upslope of the tied-back row of shear pins, we are recommending a drilled, cast-in-place pier and grade beam foundation system for the proposed residence with piers extending a sufficient depth (20 feet) into intact bedrock.

6.2 Foundation Design Criteria

6.2.1 Cast-in-Place Drilled Piers - The residence and garage should be supported on reinforced concrete piers. The drilled, cast-in-place piers should derive vertical support from adhesion (skin friction) in competent, intact bedrock as determined in the field by the Project Engineering Geologist/Geotechnical Engineer at the time of construction. Residential design may utilize the upper shear pins as part of the foundation support, as deemed appropriate by the Project Structural and Geotechnical Engineers. Piers should be sized according to the following criteria:

Vertical Capacity - minimum three (3) pier-diameter spacing apart

Minimum pier diameter _____ 18 inches

Minimum pier penetration into competent weathered bedrock _____ 20 feet

Allowable adhesion (skin friction), for reinforced concrete dead plus live loads:

In weathered bedrock _____ 475 psf

Lateral Passive Resistance - piers [equivalent fluid pressure applied over an effective width of two (2) pier diameters]

Below 2 feet in weathered bedrock material_____450 pcf

The above adhesion value (skin friction) can be increased by 1/3 for seismic loading and should be decreased by 1/2 for uplift. The upper portion of the piers should be formed to create vertical surfaces, and "mushrooming" of pier tops and over-pours around grade beams should be prevented. Drilled pier holes should be machine cleaned of all loose material prior to the placement of steel and concrete. Piers should be steel reinforced with a cage including a minimum of 4, No. 5 bars vertical (with greater reinforcement as required by the Project Structural Engineer). Casing could be necessary to prevent caving, especially in soils or landslide debris.

Water may be present in the pier holes, consequently, prior to placing concrete, the water should be pumped out until the pier holes are dry, or the concrete should be poured by tremie methods to displace the water. All pumped water and/or concrete overspill should be collected so as not to run freely across the ground surface and be disposed of offsite and outside of the coastal zone. All piers should be connected at their tops by a continuous structural slab/mat that in turn will support the structure.

6.2.2 Shear Pins – Shear pins should have a minimum diameter of at least 30 inches, and be at least 40 feet long (deep). In addition, the shear pins on the lower row should extend a minimum of 30 feet into unweathered bedrock or beneath the pad subgrade (whichever is deeper). Both shear pin rows (upper and lower) should consist of drilled, cast-in-place reinforced concrete piers that derive passive resistance to lateral forces in firm bedrock material, and be spaced at maximum 6 feet on-centers. Our analysis indicates that the shear pins should be designed to provide a minimum landslide resistant shear capacity of 40 kips (6.67 kips/ft) applied as a point load at a depth of 15 feet below top of shear pin for the lower row and a minimum landslide resistant shear capacity of 50 kips (8.33 kips/ft) 20 feet below top of shear pin for the upper row, or as a uniform load of 444 psf applied over a depth of 15 feet for the lower row and 417 psf applied over a depth of 20 feet for the upper row (analyze for both types of loading separately, and use the most critical case for design for each row).

The lateral loads can be resisted by passive pressure against the side of the shear pins using the Lateral Passive Resistance recommendation provided in Section 6.2.1, Cast-in-Place Drilled Piers, in the preceding recommendations, and tiebacks as described in the

following recommendations. A traffic surcharge of 250 psf uniform pressure should be included and applied against the top 10 feet of the piers and shear pins where the driveway/garage is within a 1:1 projected line up from a depth of 10 feet. Shear pins can be constructed using either wide flange steel beams or reinforcing bars (minimum of 9, No. 9 evenly spaced vertical bars encased by No. 3 spiral with a 3-inch pitch or greater reinforcement as required by the Project Structural Engineer).

6.2.3 Tiebacks – Our analysis indicates that the lower shear pin row should be equipped with at least one row of tiebacks located 7 feet below the existing ground surface and have a design capacity of 100 kips, and be tested to 1.33 times the design load. The tiebacks should be declined 20 degrees upslope and into the hillside, have an unbonded length of roughly 35 feet and have a minimum bonded length of 30 feet (or greater as determined by the tieback contractor in order to achieve design and testing capacities) in the unweathered bedrock, and should not extend beyond the east-west property line of 1925 El Camino De La Luz with 1927 El Camino De La Luz which is 117 feet landward of the lower shear pins. The tiebacks should be structurally connected to the shear pins and be double corrosion protected. The design adhesion in the bonded zone should be determined by the tieback contractor.

6.3 Mat Floor Foundation

For a mat foundation, the subgrade should be prepared as recommended under Site Grading (Section 6.4). The mat should be at least 12 inches thick and reinforced with minimum No. 4 steel reinforcing bars at maximum 16 inches on center, both ways, and crack control joints should be provided at maximum 12-foot intervals, both ways. Steel reinforcement may be increased and expansion joints may be added as required by the Project Civil or Structural Engineer.

6.4 Site Grading

Based on our field investigation, shallow grading excavations should be within the capabilities of heavy-duty excavation equipment (i.e., excavators, dozers, and large drill rigs); however, deeper excavations may require “ripping” and/or a “hoe-ram” to excavate. It should be noted that we encountered high blow counts in our small-diameter borings and very difficult drilling conditions in the large-diameter borehole exploration in the unweathered bedrock material.

6.4.1 Site Preparation - All loose material, vegetation, concrete, large rocks, debris, and other deleterious material, without limit, should be stripped and removed from the development envelope on the parcel, for disposal offsite and outside the coastal zone pursuant to applicable entitlement or license. In areas on the parcel to be filled, the exposed surface should be scarified to at least an 8-inch depth, moisture conditioned to at least optimum moisture content and compacted to at least 90 percent relative compaction based on ASTM D-1557-12. The subgrade beneath all fills should be keyed and benched as the fill is placed and brought upslope.

6.4.2 Compacted Fill – Excavated on-site material can be re-used as compacted fill provided it is free of organic matter and material (rocks) larger than 4 inches in diameter. Imported fill should be free of organic material and be certified weed free; it should contain no material larger than 4 inches and should have a plasticity index (P.I.) of less than 16. The fill should be placed in horizontal lifts not exceeding 8 inches in loose thickness, moisture conditioned to at least optimum moisture content, and compacted to at least 95 percent relative compaction beneath structures, slabs and within 18 inches of the aggregate baserock for pavements, and 90 percent relative compaction elsewhere based on ASTM D-1557-12.

6.4.3 Utility Trench Backfill - Utility trenches should be backfilled with approved, on-site soil. Bedding materials for pipes should be graded and placed in accordance with the manufacturer's recommendations. The backfill should be compacted to at least 90 percent relative compaction based on based on ASTM D-1557-12. Equipment and methods should be used that are suitable for work in confined areas without damaging trench walls or conduits.

6.4.4 Cut Slope Design – During the dry season, temporary cut slopes of 1.5:1 (H:V) in soils and 1:1(H:V) in bedrock should be satisfactory provided that they are inspected and approved by our field representative at the time of construction and monitored daily during construction. However, due to the dip slope bedding planes, some cuts may not be stable, and may require shoring regardless of inclination. Excavation methods, shoring, bracing and safety of excavations are the responsibility of the contractor. All excavations should comply with applicable local, State and Federal safety regulations.

6.5 Retaining Wall Designs

The following section provides our recommendations for design of site retaining walls.

6.5.1 Retaining Walls – Retaining walls should be supported on drilled, cast-in-place piers and designed according to the Foundation Design Criteria (Section 6.2.1) provided above. The retaining walls that are free to rotate should be designed to resist an active lateral equivalent fluid pressure of 50 pounds per cubic foot (pcf) for the existing slope inclination (we should be contacted in the event that backfill inclinations will exceed the existing 2.25:1 slope). The above active lateral fluid pressures should be increased by 50% for walls that are restrained from rotation (residential walls). The lateral loads on the retaining wall can be resisted by passive pressure against the sides of the piers using the lateral passive resistance provided both in foundation design criteria, above. For seismic loading, a dynamic resultant force acting at $1/3H$ up from the bottom of the wall and equal to an equivalent fluid pressure of 16 pcf should be applied to all residential retaining walls greater than 5 feet in height and any site walls located within a horizontal distance to the residence of the wall height or less.

6.5.2 Backdrain - Backdrains should be constructed behind all retaining walls. The backdrain should consist of a minimum 12-inch wide continuous blanket of either Caltrans Class 2 Permeable Material or 3/4-inch x 1/2-inch clean crushed drainrock enclosed in Mirafi 140N (or approved equivalent) filter fabric, and extended to within 1 to 1-1/2 feet of the ground surface where an impervious fill and/or asphaltic concrete cap should be placed. A minimum 4-inch diameter PVC Schedule 40 perforated drain pipe should be placed near the bottom of the drainrock (perforations down), surrounded by a minimum of 4 inches of drainrock with at least 2 inches of drainrock underlying the pipe. All backdrain pipes should be sloped to drain at a minimum of 1/2 percent and be collected in 4-inch diameter, non-perforated Schedule 40 PVC pipes which are sloped a minimum of 2 percent and discharged away from the landslide and in a suitable area which won't result in erosion.

6.6 Slabs-on-Grade and Concrete Flatwork

Slabs-on-grade and concrete flatwork subgrades should be prepared as recommended in Site Grading, above. Slab-on-grade floors, including the garage, should be directly underlain by at least 6 inches of clean, crushed drain rock (100 percent passing the 3/4-inch sieve; 0-2 percent passing the No. 4 sieve, and 0 percent passing the No. 200 sieve) except in areas of the bottom floor subdrain which should have a thicker section (See Drainage section below for mat subdrain design). For damp-proofing of the slab, a layer

of Moistop Underslab Vapor Retarder or Stegowrap should be provided over the capillary break (gravel or crushed rock).

Concrete flatwork (sidewalks, patios, etc.) should be supported on at least 6 inches of moist, compacted Caltrans Class 2 Aggregate Base rock material. The 6 inches of compacted base rock material should, in turn, be underlain by compacted fill or firm natural material.

Slabs and flatwork should be steel reinforced with at least No. 4 bars at 18 inches on centers each way (or greater reinforcement as determined by the Project Structural Engineer), and provided with crack control joints at maximum 10 feet on centers, both ways.

6.7 Drainage

Because of the detrimental influence of water as it interacts with soil, bedrock, foundations, pavements, and cut and fill slopes, it is important that surface water be controlled. Grades should be sloped to drain at a minimum of 2 percent for a distance of at least 10 feet out from structures with runoff directed into an appropriate catch basin/storm drain system. All roof runoff should be collected in gutters with downspouts tied into tightline pipes (Schedule 40 PVC) that also discharge into a catch basin/storm drain. The catch basin/storm drain should discharge into the property and City storm drainage system.

Where concrete curbs are used to isolate landscaping in or adjacent to pavement areas, we recommend that the curb extend a minimum of 8 inches into low permeable material below the baserock to provide a barrier against the migration of landscape water into the pavement section.

6.7.1 Sub-Floor Mat/Slab Subdrains – The mat/slab-on-grade floor should be underlain by a minimum 6-inch thick blanket of clean, free-draining crushed rock or gravel as specified in Slab-on-Grade and Concrete Flatwork sections, above. The blanket subgrade should be cut to drain (hydraulically connected) to one of the sub-floor subdrains which should be spaced at minimum 30-foot intervals and extend across the entire slab. The sub-floor slab subdrains should consist of a 4-inch diameter perforated Schedule 40 PVC pipe sloped a minimum of 1/2 percent and placed in a minimum 12-

inch wide, 6- to 18-inch deep or deeper (depending on the dimensions of the sub-floor) trench filled with crushed rock or gravel and a sheet of filter fabric separating the gravel from the blanket subgrade. There should be 2 inches of drainrock in the bottom of the trench, below the pipe. The subdrain pipes should be collected in 4-inch diameter, non-perforated Schedule 40 PVC pipes sloped a minimum of 2 percent and discharged either directly into the storm drain system by gravity outlet, or drained into a sump(s) equipped with a pump(s) which in turn flow into the property storm drainage system. The retaining wall backdrains should also be collected and drained in a similar manner as the sub-floor slab subdrain, or combined, if preferred. Clean-outs should be provided at both ends of each the sub-floor slab subdrain. Surface water should not be discharged into subdrain pipes.

6.8 Seismic Design

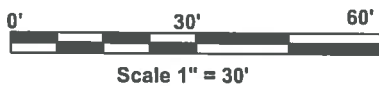
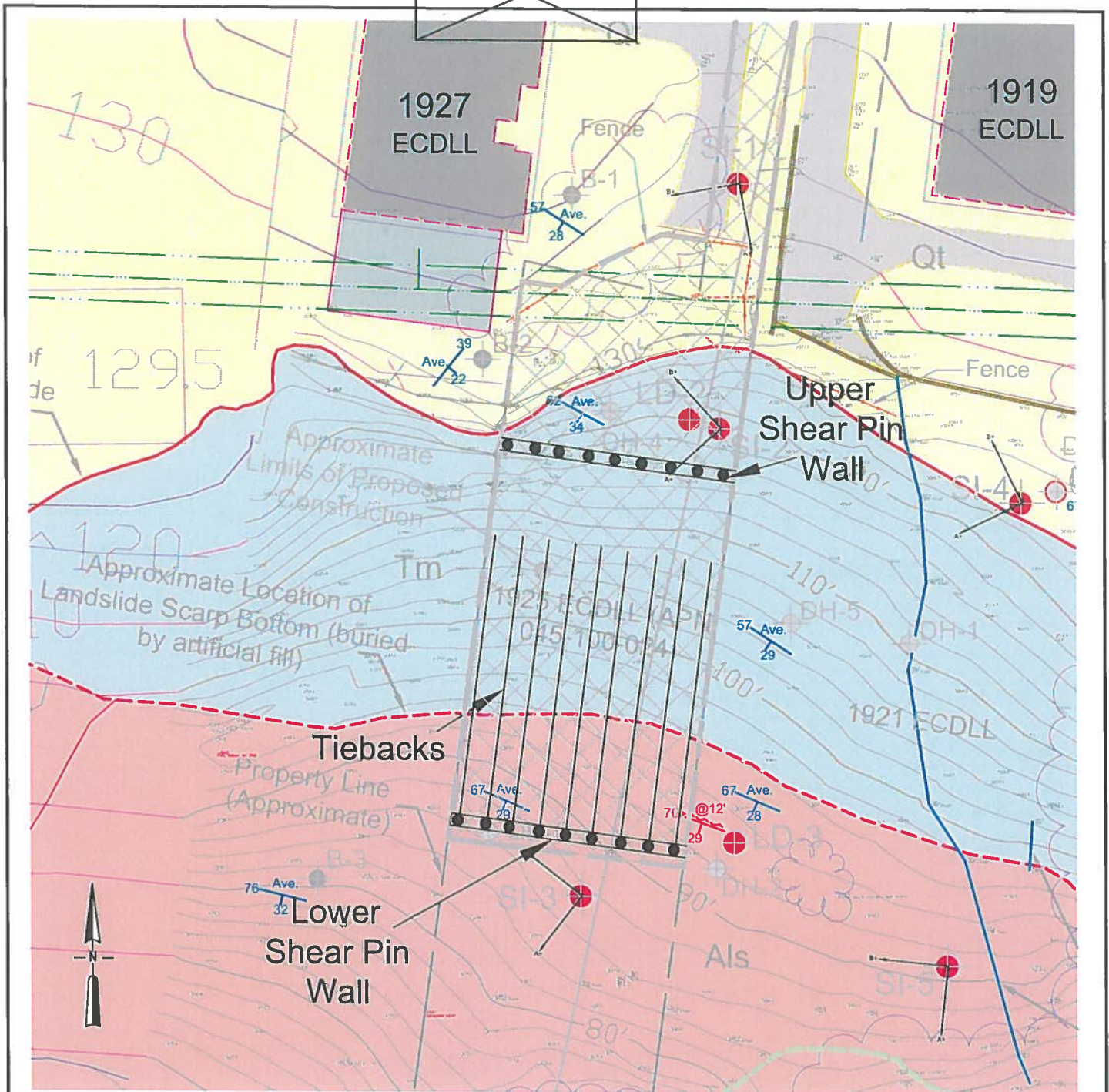
A peak ground acceleration of 0.44 g should be anticipated for design purposes.


Based on our geotechnical investigation, the site location and our interpretation of the 2007 CBC documents related to Earthquake Loads (CBC Section 1613), we are providing the following parameter recommendations from the corresponding figures and tables:

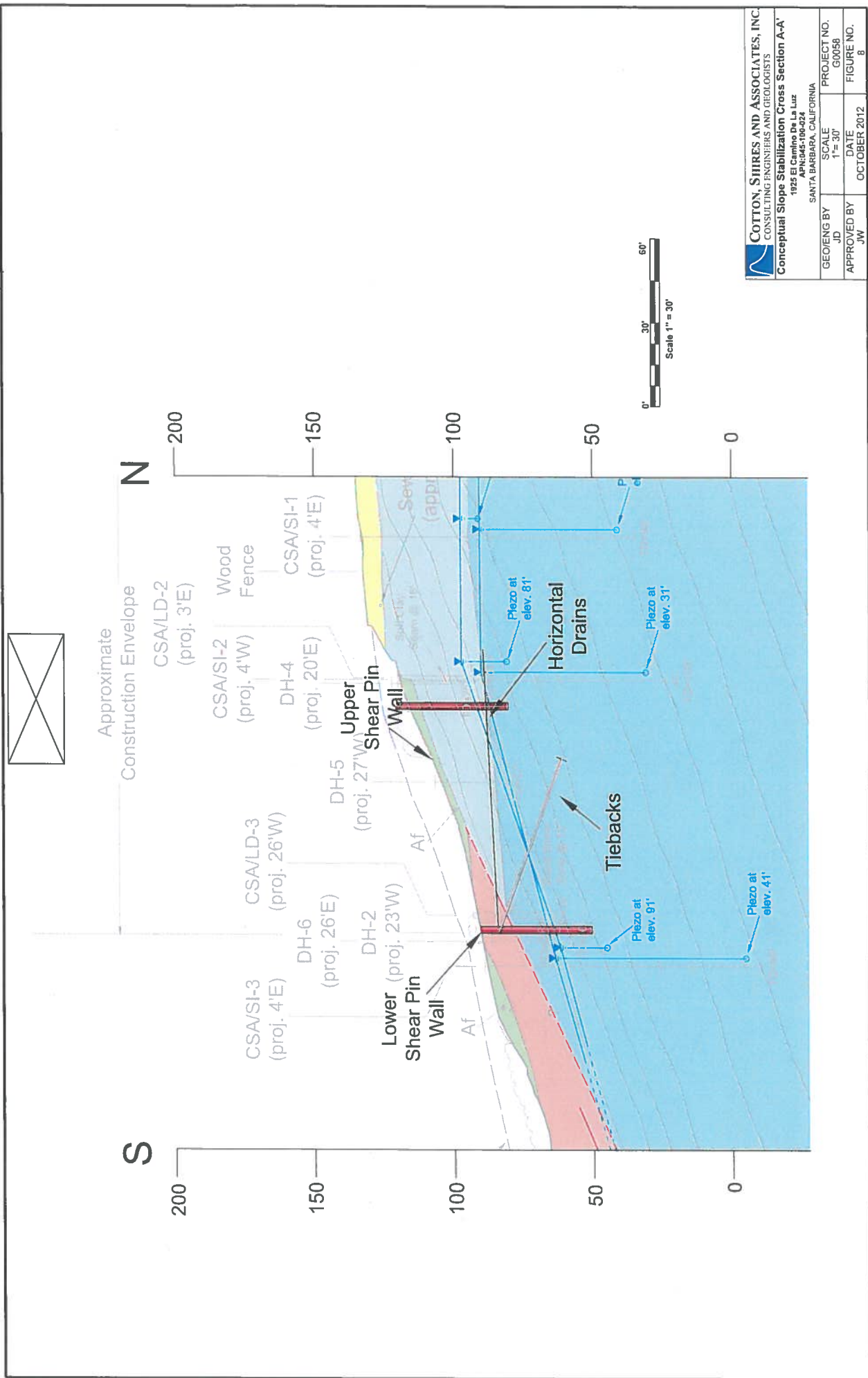
Parameter	Referenced Table/Figure/Eqn.	Value
Site Classification	1613.5.2	C
Mapped Spectral Acc. 0.2 Sec. (g)	1613.5(3)	$S_s = 1.890$
Mapped Spectral Acc. 1 Sec. (g)	1613.5(4)	$S_1 = 0.711$
F_a – Site Coefficient	1613.5.3(1)	1.0
F_v – Site Coefficient	1613.5.3(2)	1.3
Seismic Design Category	1613.5.6	D
$S_{MS} = F_a S_s$	16-37	1.890
$S_{M1} = F_v S_1$	16-38	0.924
$S_{DS} = 2/3 S_{MS}$	16-39	1.260
$S_{D1} = 2/3 S_{M1}$	16-40	0.616

6.9 Horizontal Drains

We recommend horizontal drains be installed along the lower shear pin wall. The drains should be spaced approximately 18 feet apart to avoid the upper shear pin wall, be inclined 2-degrees upward upslope, and extend a minimum of 100 feet into the slope. The drain outlets should be connected to tightline collector pipes and discharge into the newly established storm drain system designed to capture the residential runoff. The horizontal drains should be equipped with cleanout access ports, and the drains should be periodically flushed and inspected at a maximum of 5-year intervals.



 COTTON, SHIRES AND ASSOCIATES, INC. CONSULTING ENGINEERS AND GEOLOGISTS		
CONCEPTUAL SLOPE STABILIZATION PLAN		
1925 El Camino De La Luz Santa Barbara, California		
GEO/ENG BY JW	SCALE 1"=30'	PROJECT NO. G0058
APPROVED BY JW	DATE OCTOBER 2012	FIGURE NO. 7



1925 EL CAMINO DE LA LUZ RESIDENCE (MST#2013-00240)
MITIGATION MONITORING AND REPORTING PROGRAM

June 22, 2016

Recommendations from
Hydrology Report (June 25, 2015)
Prepared by Cotton, Shires and Associates, Inc.

In the following appendix table, we list the recommended BMPs, the Sub-Catchment number to which they apply, their description, the area or diameter (if a pipe), elevations in and out of them and the outflow receiving device.

BMP #	SC #	STRUCTURAL/ OPERATIONAL BMP DESCRIPTION	AREA/ DIA.	ELEVATION		OUTFLOW RECEIVING DEVICE
				IN	OUT	
1	1	Cistern in ECDLL ROW (SC-1) below ECDLL pavement, with pipe for pumping excess storm water from WST-1, WST-3. <i>(Additional Recommendation to City to avoid water waste.)</i>	TBD	TBD	TBD	City FD/PWD uses.
2		Replacement of (E) curb and gutter with (N) curb and gutter in 1925 ECDLL ROW (SC-1), with excess water outflow pipe outfall(s) from WST-1, WST-2, and WST-3. Pipe at outfall to be fitted with automatic backup flow control valves. Curb with stenciled standard City "No Dumping" notice.	As Designed	Varies	Varies	ECDLL municipal storm drain.
3		Litter removal, as necessary, adjacent to 1925 ECDLL after each ECDLL curb-side garbage pick-up.	312 ft ²	Varies	Varies	ECDLL municipal storm drain.
4		Monthly gutter sweeping (in ECDLL ROW north of 1925 ECDLL).	18.75 ft ²	Varies	Varies	ECDLL municipal storm drain.

BMP #	SC #	STRUCTURAL/ OPERATIONAL BMP DESCRIPTION	AREA/ DIA.	ELEVATION		OUTFLOW RECEIVING DEVICE
				IN	OUT	
5	2	(N) Repavement of (E) 1925-1927 ECDLL driveway ramp in ECDLL ROW, (N) widening of adjacent 1925 ECDLL drive-way ramp, both with (N) filter strip, and (N) restoration with horticultural native vegetation of the ECDLL ROW green strip (SC-2) adjacent to (east of) the wid-ened 1925 ECDLL driveway ramp.	86 ft ²	Varies	Varies	ECDLL municipal storm drain.
6		(N) Dry Stand Pipe in ECDLL ROW green strip (SC-2), for City FD/PWD access to retained storm water in WST-1, WST 2	8 ft ²	TBD	TBD	City FD uses.
7		(N) Monthly drive-way ramp filter strip maintenance.	10 ft ²	As De- signed	As De- signed	Collected filter strip debris to closed trash can in garage.
8	3	(N) Repavement of (E) 1925 ECDLL part of joint 1925- 1927 ECDLL driveway (SC-3, 1,029 ft ²) with flag-stone pavers.	330 ft ²	Varies	Varies	DI CB3P.
9		(N) DI CB3P, with trash grate and sediment fil-ter.		135.00	128.00	DJB 4.5.
10		(N) Monthly driveway sweeping.	330 ft ²	Varies	Varies	Collected debris to closed trash can in gar-age.
11	4	(N) Repavement of (E) 1925 ECDLL part of joint 1925- 1927 ECDLL driveway (SC-4) with flagstone pav-ers.	210 ft ²	Varies	Varies	TD CB4P.

BMP #	SC #	STRUCTURAL/ OPERATIONAL BMP DESCRIPTION	AREA/ DIA.	ELEVATION		OUTFLOW RECEIVING DEVICE
				IN	OUT	
12		(N) Monthly driveway sweeping.	210 ft ²	Varies	Varies	Collected debris to closed trash can in garage.
13	5	(N) TD CB4P, with trash grate, sediment filter, and 8-inch (v) East-West berm along south edge, to avoid discharge to downslope SC-5.	As De- signed	128.50	128.00	1921 Driveway.
14		(N) Restored Upper Private Open Space, with horticultural native vegetation and steps, 48 ft ² .	884 ft ²	127.00	119.00	DI CB5P.
15	6	(N) Widened 1925 ECDLL driveway on 1925 ECDLL (SC-6), with flagstone pavers and restored driveway berm at the SC-2/SC-6 boundary (≤ 4 inches above top of curb).	1,340 ft ²	Varies	Varies	DI CB6P.
16		(N) Restoration with horticultural native vegetation of the 1925 ECDLL driveway east side yard, with a restored crown at the SC-2/SC-6 boundary (min. 4 inches above top of curb).	275 ft ²	Varies	Varies	DI CB6P.
17		(N) 8-inch (v) Berm along the east side of the 1925 ECDLL widened driveway easterly side-yard (1925-1921 ECDLL PL).	108 ft ²	Varies	Varies	DI CB6P.
18		(N) Drain Inlet (DI) CB6P.	As De- signed	128.50	128.0	WST-1.
19		(N) Monthly driveway sweeping and DI maintenance.	1,340 ft ²	Varies	Varies	Collected debris to closed trash can in garage.

BMP #	SC #	STRUCTURAL/ OPERATIONAL BMP DESCRIPTION	AREA/ DIA.	ELEVATION		OUTFLOW RECEIVING DEVICE
				IN	OUT	
20	6	(N) Round Pipe Storage Subsurface Water Storage Tank (WST) 1, 1,018 cf (7,615 gallons), w/pump, primary and backup power, oil-grease separator, filtration, UVL water treatment.	D:108 in L: 16 ft	127.50	127.0	1. WST-2 (by gravity flow, when warranted). 2. Pumped by SBFD via Dry Stand Pipe (as needed in an emergency). 3. WST-3 (by gravity flow, when warranted). 4. Excess storm water pumped to BMP 1, City Cistern in ECDLL ROW (if available). 5. Excess storm water by gravity flow in DP P, to Drain Outfall P at SC-18/SC-19 boundary.
21	7	(N) DJB 4.5P	As Designed	As Designed	As Designed	1921 Driveway.
22		(N) Drain Pipe Outfall in easterly Lower 1925 ECDLL Driveway RW.	As Designed	As Designed	As Designed	SC-10 (1921 ECDLL).
23		(N) Trench Drain (TD) CB7, with trash grate and sediment filtration.	As Designed	121.50	119.0	WST-2.
24		(N) Monthly driveway sweeping and TD maintenance.	653 ft ²	Varies	Varies	Collected debris to closed trash can in garage.
25	8	(N) Garage Entry Driveway, House Entry Pavement, Turnaround (SC-8).	958 ft ²	Varies	Varies	TD CB8.
26		(N) Trench Drain (TD) CB8, with trash grate and sediment filtration.	As Designed	119.50	119.0	WST-2.

BMP #	SC #	STRUCTURAL/ OPERATIONAL BMP DESCRIPTION	AREA/ DIA.	ELEVATION IN OUT		OUTFLOW RECEIVING DEVICE
27	8	(N) Monthly driveway, entry, turnaround sweeping and TD maintenance.	958 ft ²			Collected debris to closed trash can in garage.
28		(N) Round Pipe Storage Subsurface Water Storage Tank (WST) 2, 1,909 cf (14,279 gallons), w/pump, primary and backup power, oil-grease separator, filtration, UVL water treatment.	D:108 in L: 30 ft	110.0	As Designed	1. Non-potable water tank in house utility room (ABDS, Sheet A0.01, May, 2015). 2. WST-1 (by pumped flow, when warranted). 3. WST-3 (by gravity flow, when warranted). 4. Excess storm water pumped to BMP 1, City Cistern in ECDLL ROW (if available). 5. Excess storm water by gravity flow in DP P, to Drain Outfall P at SC-18/SC-19 boundary. 6. Excess storm water pumped to drain outfalls in ECDLL curb to municipal storm drain gutter.
29	11	(N) Restored Upper West Side yard (SC-11), with flow line, walkway, horticultural native vegetation plantings.	500 ft ²	Varies	Varies	DI CB 11P.
30		(N) DI CB 11P.	As Designed	As Designed	As Designed	WST-3.
31	12	(N) Restored Upper East Side Yard (SC-12), with flow line, steps from SC-8, walkway, horticultural native vegetation plantings.	413 ft ²	Varies	Varies	DI CB 12P.
32		(N) DI CB 12P.	As Designed	As Designed	As Designed	WST-3.
33	13	(N) North-draining Roof of House Foyer/Entry and Garage, and Foyer Deck.	1,245 ft ²	119.0	118.50	DI(s) CB 13P.

BMP #	SC #	STRUCTURAL/ OPERATIONAL BMP DESCRIPTION	AREA/ DIA.	ELEVATION		OUTFLOW RECEIVING DEVICE
				IN	OUT	
34		(N) DI(s) CB 13.	As De- signed	As De- signed	As De- signed	WST-2
35	14	(N) South-draining Roof of House, w/Green Roof (West and East Planters, Solar 2H ² O a/o PV Cells).	945 ft ²	As De- signed	As De- signed	DI(s) CB 14,
36		(N) DI(s) CB 14.	As De- signed	As De- signed	As De- signed	WST-3
37	15	(N) Lower House Level Patio, with Steps to/from House, Lap Pool.	461 ft ²	As De- signed	As De- signed	Patio Deck and House-Patio Steps: DI(s) CB 15P. Lap Pool: Direct.
38		DI(s) CB 15P.	As De- signed	As De- signed	As De- signed	WST-3
39		(N) Box Pipe Storage Subsurface Water Storage Tank (WST) 3, W: 96 in; H: 96 in; L: 30 ft; 1,920 cf (14,362 gallons), w/pump, primary and backup power, oil-grease separator, filtration, UVL water treatment.	240 ft ²	87.0	95.0	1. WST-2 (by pumped flow, when warranted). 2. WST-1 (by pumped flow, when warranted). 3. Excess storm water pumped to BMP 1, City Cistern in ECDLL ROW (if available). 4. Excess storm water by gravity flow in DP P, to Drain Outfall P at SC-18/SC-19 boundary. 5. Excess storm water pumped to drain outfalls in ECDLL curb to municipal storm drain gutter.
40	16	(N) Sub-surface 2° horizontal drains (3), with connector pipe, below SC's 5, 7, 8, 11, 12, 14, 15, 17.	1-1/2"	As De- signed	As De- signed	WST 3.
41	17	(N) Restored Temporary Construction Bench/Lower Private Open Space, with Lower West and East Side Yards, Steps from Lower Patio, Horticultural Native Vegetation Plantings, Flow Lines.	1,516 ft ²	As De- signed	As De- signed	Flow Lines, in-situ and to SC-18 boundary.

BMP #	SC #	STRUCTURAL/ OPERATIONAL BMP DESCRIPTION	AREA/ DIA.	ELEVATION		OUTFLOW RECEIVING DEVICE
				IN	OUT	
42	18	(N) Horticultural Lemonade Berry Mitigation Area/ Restored City (1978) Toe of Grading Area	590 ft ²	As De- signed	As De- signed	Flow Lines, in-situ and to SC-19 boundary.
43		(N) Multi-port outfall, w/energy dissipation, along SC-18/SC-19 boundary of excess storm water from WST-1, -2, and/or -3.	As De- signed	As De- signed	As De- signed	Contiguous Lemonade Berry Shrubs (SC-19)
44	19	(E) Contiguous Lemonade Berry Shrubs/Proposed Open Space OTD	6,361 ft ²	As De- signed	As De- signed	In-situ.
45		(N) Seasonal Earthen Material Water Bars (8) in Re-vegetating/ Closing Surveyor's Path (2005/6)	80 ft ²	As De- signed	As De- signed	In-situ and to 1927 ECDLL per Doolittle (1984) grading.
46	20	(E) Coastal Bluff/Proposed Open Space OTD (inclusive of BMP 42 area)	1,658 ft ²	52 ft	11 ft	In-situ and back beach cobble-sand area (SC-21).
47		(N) Temporary upper NW coastal bluff face restoration (transient trespass erosion area)	±50 ft ²	51 ft	44 ft	In-situ and to back beach cobble-sand area (SC-21).
48	21	(E) Back Beach (SC-21, Base of Coastal Bluff to MHTL [SLC])	2,110 ft ²	11 ft	±4 ft	In-situ and to receiving waters of the Santa Barbara Channel of the Pacific Ocean.
49	3-20	(N) Annual Pre-October 1 Inspection and Maintenance/ Repair of all SWMS components.	See BMPs 1-48	See BMPs 1-48	See BMPs 1-48	See BMPs 1-48

BMP #	SC #	STRUCTURAL/ OPERATIONAL BMP DESCRIPTION	AREA/ DIA.	<u>ELEVATION</u>		OUTFLOW RECEIVING DEVICE
				IN	OUT	
50	3-2	(N) Monitoring and Reporting to City of WST and SWMS performance within 5 business days after (a) ≥ 100 year recurrence 24 hour rain event at SB County Station 234, or (b) local/regional seismic event $\geq 6.0M$.	NA	NA	NA	NA

1925 El Camino de la Luz Mitigated Negative Declaration (MND)
SUMMARY OF COMMENTS ON DRAFT MND AND TOPICAL RESPONSES
June 22, 2016

The following summarizes public comments on the draft environmental analysis for a project to develop a residence at 1925 El Camino de la Luz (*Draft MND, 02-03-16*), and overall staff responses by topic. Revisions to the proposed Final MND have been made as applicable. Other comments not addressing the environmental analysis, such as comments in support or opposition to the project, will be forwarded for decision-maker consideration.

Project Description

1. **Project description details.** *Comments identified corrections and clarifications to the written project description (N. Dall 03-10-16)*

Response: Some suggested revisions to the written project description in the proposed Final MND (FMND) have been made for clarification and correction, and to reflect the refined project plans submitted by the applicant (04-25-16). The corrections and clarifications pertain to descriptions of, native species vegetation, slope stabilization work, and temporary construction staging (see further detail in item 22 below). These minor revisions do not involve changes to the impact analysis conclusions.

2. **Construction staging area.** *Comments requested further detail clarifying proposed construction staging area for equipment, materials, and vehicles on the adjacent property, and its restoration following project construction (N. Brock 02-22-16, 05-02-16; Single Family Design Board 02-22-16, 05-02-16; Planning Commissioners 03-02-16).*

Response: The construction process including staging areas is discussed in the MND/Initial Study sections on project description, visual resources (§1), air quality (§2), biological resources (§3), geology (§5), noise (§7), public services/solid waste (§9), traffic (§11), and water quality (§12). The text discussions in the proposed FMND have been augmented for clarification.

Staging areas for the project construction process would be located on the project site, and on the adjacent property at 1921 El Camino de la Luz through a temporary lease agreement (Sheet A0.01 of project plans, 04-25-16).

On the project site, the existing driveway would be used for materials and equipment staging for work on the project driveway, eastern side yard, and erosion control/runoff filtration components.

The upper portion of the undeveloped property at 1921 El Camino de la Luz next to the project construction envelope would be used as a staging area for the temporary storage of materials, equipment, and vehicles for project construction activities and would be accessed via the existing driveway. The staging area comprises approximately 5,000 square feet of area that currently has four lemonade berry bushes and other mature vegetation (approximately 6-10 feet in height) along the northerly and easterly boundaries, and a wood fence on a concrete wall along the property lines of 1921 El Camino de la Luz with 1919 and 1909 El Camino de la Luz. The upper portion of the staging area is relatively flat and the lower portion has steeper slopes.

Preparation of the staging area would include removal of the lemonade berry shrubs and other vegetation, installation of security fencing and erosion control devices (e.g., filter strips, silt fencing, hay bales, straw wattles, and temporary jute netting with pins). A minor amount of grading would be undertaken to establish a temporary earthen ramp providing access between the staging area and the 1925 project construction area. No other grading is proposed. Following completion of

construction activities, the staging area would be cleared of equipment, the temporary ramp would be removed, and the area would be revegetated with native species and drought-tolerant vegetation, including new lemonade berry plants, consistent with an approved landscape plan. Driveway repairs would be made as necessary.

The temporary staging areas and the landscape plan are part of the project subject to approval by the City Planning Commission, with final design approval by the Single Family Design Board (SFDB) consistent with post-construction measures for drainage, water quality control, and revegetation. As identified in the Mitigation Monitoring and Reporting Program (MND Exhibit) the staging area would be subject to confirmation for installation of design components (e.g., drainage control), and monitoring for control measure compliance throughout the construction process (e.g., for visual, air quality, geology, noise, traffic, water control provisions) by a designated Project Environmental Coordinator (PEC) and City Planning Division and Building Division staff. Post-construction treatment (e.g., revegetation) would be reviewed for compliance prior to final inspection for occupancy.

Visual Resources

- 3. *Public scenic views from the street.*** Comments expressed concern that the project would block existing ocean views from El Camino de la Luz at the top of the project site (L. and S. Wiscomb 03-06-16; M. and J. Maybell 03-09-16).

Response: As discussed in the MND (Initial Study Section 1a, and attached photographic study exhibit), a scenic view of the ocean is visible from El Camino de la Luz in the distance across the project site, providing a brief glimpse by vehicle, bicycle, and pedestrian travelers. The view corridor includes the project site driveway (an approximately 10-foot wide driveway shared with the 1927 El Camino de la Luz parcel to the west), vegetation, fencing, and overhead utility lines. The project site driveway and the adjacent driveway (for 1919 and 1921 El Camino de la Luz) provide a narrow corridor of approximately 35 feet in width between the adjacent residences to the east and west.

The project is proposed to be built lower on the parcel (between the 80 foot and 130 foot elevations) than are the other existing homes along El Camino de la Luz, which are built closer to the street. The project has been designed to not be visible from El Camino de la Luz, and would not block the existing ocean view from the public street looking across the site to the ocean. The project would also remove the existing east-west gated fencing located near the base of the existing driveway, which would enlarge the view corridor compared to existing conditions. An offer to dedicate a public view corridor easement to maintain the view through the project site is included as a project component. The project would result in an incremental change and improvement to the existing public scenic view from the street. The Mitigated Negative Declaration analysis concludes that the project effect on the public scenic view from the street would not be substantial, and would not constitute a significant impact, a considerable contribution to a cumulative effect, or a policy conflict.

Temporary Construction Staging. The project proposes to store construction materials and equipment on the existing driveway and on a staging area on the adjacent parcel at 1921 El Camino de la Luz. The project proposes that stored materials be covered with landscape colored material, and equipment would be stored on the staging site at 1921 El Camino de la Luz where it cannot be seen from the street vantage point. The overall project construction process is estimated to last up to 70 weeks (1.3 years). The temporary construction staging areas are subject approval by the Planning Commission and Single Family Design Board as part of the project, and approved plan provisions and permit conditions would be monitored through the construction process. The MND analysis concludes that the impact on public scenic views from the street would be temporary and minimal, and would not

constitute a significant impact, a considerable contribution to a cumulative impact, or a coastal policy conflict.

Alternatives. The parcel is a flag lot with a driveway and limited buildable area at the top of the lot as demonstrated by the Floor to Area Ratio (FAR) study (MND Exhibit D2). Moving the development closer to the street would increase public visibility and block existing public ocean views from the street. There is no feasible alternate siting location for the residence that would further reduce visibility or minimize incremental effects on views from the street.

4. **Public coastal views from the beach and ocean.** *Comments expressed concern for the project impact on views from the vantage point of the beach and ocean up toward the urbanized city and mountains. (S. Krome & J. Morgan 02-22-16 & 03-06-16; M. and J. Maybell 03-09-16; L. and S. Wiscomb 03-06-16; Planning Commissioners 03-03-16; Coastal Commission 03-10-16)*

Response: The MND (Initial Study section 1.a) analyzes this issue. The project would be sited between the 80 foot and 130 foot elevations above the beach, 169 feet upslope from the lower bluff step. Intervening topography and existing vegetation would screen its visibility from most locations to the east and west on the beach (approximately 400-600 foot distances) and from offshore in the Santa Barbara Channel (approximate 600-2,500 foot distances). The top portion of the proposed structure (above the vegetation planter boxes to be located around the west, south, and east elevations of the structure) would be partially visible from some locations (from south, southeast, and southwest) on the beach and immediate off-shore Channel area below the project site and lower bluff step (see MND Exhibit D1 photographic study). From some locations further distant off-shore, the residence would be more visible but smaller. This is similar to the other existing residences along Camino de la Luz, with intervening topography and vegetation blocking the view from many shoreline locations and only the tops of residences visible from some locations.

The project would not result in a substantial change in area views inland from the beach and ocean due to the following factors: (1) the single residence is of a minor scope of development, and most of the 0.45-acre site would remain in undeveloped vegetated open space between the beach and project; (2) the residence would be viewed from a substantial distance, and the project would be an in-fill residence located within the context of a line of numerous single-family residences along several miles of this low-density urbanized area of the coast; (3) intervening topography and existing vegetation screens visibility from many locations and only the top of the residence would be visible from some beach and off-shore locations, similar to other residences in the area; and (4) the residence stepped architecture, materials, earth-tone color palette, and landscaping has been designed to blend into the slope and setting when viewed from a distance and would be subject to design approval for compatibility and visual aesthetics per City design guidelines. The view analysis exhibit using representative locations on the beach and ocean below the project parcel demonstrates limited visibility and supports the conclusion of no substantial change in coastal views. As such, the project impact to existing public coastal views from the beach and ocean would be less than significant, and would not constitute a considerable contribution to a cumulative impact. This component of the project could be found consistent with coastal policies for the protection of public coastal views, and based on the above impact analysis, a decision-maker determination of policy conflict would not constitute a significant environmental impact under CEQA.

In response to Single Family Design Board concept review comments on February 22, 2016, the applicant made the following revisions to the proposed project (project plans 04-25-16), which were viewed favorably by the Single Family Design Board at the subsequent concept review hearing on May 2, 2016: (a) an overall reduction in the size of the structure from 3,545 square feet (net) to 3,360

square feet (net). The residence was reduced from 3,101 to 2,789 square feet and the garage was increased from 444 to 571 square feet., (b) a reduction in the height of the upper level (level 2 living area) from 30 to 25 feet, with the overall height remaining at 30 feet, (c) architectural modifications to further step the building into the slope and site, (d) increased vegetation screening around the exterior of the residence (planter boxes to break up the west, south, and east structural elevations), (e) reduction of reflective materials (replacement of glass railings with cable rails, reduction of glazing at the staircase element on the west elevation; deletion of the roof-top solar energy component, but retaining area for possible future installation); (f) an earth-tone color palette to blend the project into the site when viewed from a distance; (g) increased landscape screening; and (h) more detail on exterior lighting design. All these measures apply coastal guidelines for minimizing view impacts and further reduce the less than significant project effect on views from the beach and ocean.

Temporary Construction Staging Area. Analysis is also provided of views from the beach of the temporary project construction staging area for materials and equipment to be located at 1921 El Camino de la Luz (MND Exhibits D1, A3). The project site is located within an existing urbanized neighborhood, and the view toward the staging area is against the backdrop of existing urban development. The project proposes that stored materials would be covered with landscape colored material, and equipment stored on the site where it cannot be seen from the beach or street vantage points. The analysis demonstrates that the staging area and equipment use would not be visible to a height of 8-10 feet from the beach south of the property at the mean high tide line (MHTL) due to topography and vegetation. Views from the beach to the southwest and southeast of the site would be largely screened by topography and vegetation but would be intermittently visible, and the site would be visible from off-shore. This impact is incremental and temporary, and does not substantially change area coastal views from the beach, a less than significant impact and not a considerable contribution to a cumulative impact.

Alternatives. The parcel is a flag lot with a driveway and limited buildable area at the top of the lot as demonstrated by the FAR study (MND Exhibit D2). Moving the development closer to the street would increase public visibility from coastal locations and block existing ocean views from the street. As such there is no feasible alternate siting of the residence that would further reduce visibility or further minimize incremental effects on views from the coast.

5. Onsite visual quality and impacts to private views

Private Views. Comments expressed concern with the project impact on private views from neighboring residences and suggested that the project be reduced in height and size and/or be sited closer to the street per other homes in the area. (M. and D Smith 02-22-16; J. Dorn 02-22-16; R. Stenson 02-22-16; SFDB 02-22-16). At the concept review meeting held on 02-22-16, the Single Family Design Board comments requested that the building size and height be reduced; the shape of the house be modified to include area within the building elevations allowing additional landscaping to diminish the elevation impacts, particularly to east and west neighbors; more detailed preliminary landscape and irrigation plan be submitted; information be submitted on surrounding home square footages and floor-to-area ratios (FAR) and FAR of any potential buildable area closer to the street; and changes be made to various building materials.

Response: The MND (Initial Study Section 1.a) addresses this issue. Impacts to private views are not generally considered a significant environmental impact under CEQA unless a project would substantially affect important scenic views from a large portion of the community. Portions of the residence would be partially visible from some other private residences in the surrounding area but not from a large portion of the neighborhood, Mesa community or City due to topography and

vegetation. The project siting at the proposed lower location preserves the public ocean view corridor from the street.

Given the limited scope of the project for developing a single residence, the limited number of private views affected, the context of an in-fill project within an existing line of single-family residences, and the requirement for design review of structures and landscaping per City design guidelines, the project effect on existing private views would not be substantial and would not constitute a significant impact or a considerable contribution to cumulative effects on private views. The project effects could be found consistent with coastal policies for protection of scenic views. Based on the above impact analysis, a decision-maker determination of a policy conflict on this issue would not constitute a significant environmental impact under CEQA.

As stated previously, design refinements have been made to the proposed project (04-25-16 project plans). These project design refinements would further reduce the less than significant view impacts to private residences in the surrounding area.

Onsite visual quality. Comments question the visual impact of the project with respect to onsite visual character and quality, including concerns with the project size and height, compatibility with neighborhood houses, and location further downslope than other homes along El Camino de la Luz (B. Peterson 02-22-16, M. & D. Smith 02-22-16; J. Dorn 02-22-16, 03-03-16; R. Stenson 02-22-16, 03-02-16; G. & J. Smith 02-22-16; Single Family Design Board (SBDB) 02-22-16, 05-02-16).

Response: The MND (Initial Study section 1.a) discusses this issue. The project for one residence is limited in scope, with a majority of the site remaining in native vegetation and open space; would be sited as in-fill development within an existing urban neighborhood of other single-family residences; and would be visible from few locations due to topography and vegetation. The project siting, limited grading, architecture, color palette, and landscaping is designed to blend the residence into the site and is subject to design review approval for compatibility and visual character per City design guidelines. As such the project impact to onsite visual character, quality, and compatibility would be less than significant, and would not constitute a considerable contribution to cumulative effects. It would not be expected that the project onsite visual effects would be found in conflict with coastal visual resources policies, and based on the above impact analysis, any such determination of policy conflict would not constitute a significant impact under CEQA.

Based on a study of the sizes and floor-to-area ratios (FAR) of the twenty closest homes (MND Exhibit D2), the project (3,545 SF with garage, 0.18 FAR) would be larger than the average size of homes in the surrounding area (2,713 SF, 0.21 FAR) but within the range of home sizes (including garages) and FARs (1,388 SF to 6,137 SF, .06 - .42 FAR).

Since the initial SFDB concept review on 02-22-16, the project has been modified to reduce the residence size from 3,101 to 2,789 square feet (with garage increased from 444 to 571 square feet); reduce the height of the level 2 living area portion of the building from 30 to 25 feet (while retaining a maximum height of the stepped building at 30 feet); provide for further architectural delineation to step the residence into the site; and landscape screening and earth tone color palette to reduce visual effects of the building elevations to the views of neighboring residences and from public coastal locations. Landscaping with native vegetation has been increased and further detail identified in the preliminary landscape plan. At the SFDB concept review on 05-02-16, SFDB member comments indicated that the project size, height, architecture, color palette, and landscape design were reasonable and in keeping with City design guidelines for visual compatibility. The project design refinements would further reduce less than significant project impacts associated with onsite visual quality.

6. **Lighting and glare**

Project glare impacts. Comments express concern about potential project glare impacts to neighbors and coastal visitors (M. and D. Smith 02-22-16; J. Dorn 02-22-16; L. and S. Wiscomb 02-22-16; SFCB 02-22-16, 05-02-16).

Response: This issue is addressed in the MND (Initial Study section 1.e). Project lighting design is subject to City design review approval of architectural design and materials relative to the *Single Family Residence Design Guidelines*. Exterior lighting is also subject to the Municipal Code lighting ordinance that provides for shielding and directing light to avoid glare effects to off-site locations. As such, no significant glare impacts would result and the project effects would not constitute a considerable contribution to cumulative effects. Project lighting would be potentially consistent with lighting policies and coastal visual resources policies, and based on the above impact analysis, any such determination of policy conflict would not constitute a significant environmental effect under CEQA.

Based on conceptual review comments of the Single Family Review Board (02-22-16), the project design was refined to reduce project components with the potential for reflective glare, including replacement of glass railings with a cable rail system; reduction of glazing at the staircase element on the west elevation; increased landscape screening; deletion of the roof-top solar energy component; and provision of further detail for the location of exterior lighting, all of which further reduce the potential for glare impacts. The project design will be subject to further review by the SFDB for project design review approvals. A Recommended Measure for lighting design is identified below requiring a further detailed lighting plan for review and approval by the SFDB as part of the project's preliminary and final design review.

Recommended Measure

RM V-1 *Lighting Design.* The applicant shall submit a detailed project lighting plan for approval by the Single Family Design Board as part of project design review approvals.

7. **Coastal Commission comment about visual resources**

Impact to Visual Resources. Comments from Coastal Commission staff included a general statement characterizing visual impact significance, and referencing coastal policies for protection of coastal visual resources, with the opinion that any project visibility and incremental impact to views from the coast could constitute an inconsistency with these policies and thereby a significant environmental impact and that alternatives should be studied to identify a minimal project. (M. Sinkula 03-10-16).

Response: State and City guidelines for assessing visual impacts (CEQA Guidelines Appendix G, MND Exhibit B) require that identification of a significant visual impact be based on a "substantial" project effect. The CEQA Guidelines provide that impact significance determinations must be specific to the project and assessed based on the environmental context (§15064 (b)). The CEQA Guidelines for determining impact also specify that the existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that a proposed project's incremental effects are cumulatively considerable (§15064 (h)).

The MND (Initial Study section 1) addresses impact significance of project visual impacts. As discussed in items 3-6 above, the single residence project is limited in scope, with a majority of the 0.45 acre site remaining in undeveloped open space, and constitutes in-fill development within the context of a line of homes in an existing developed urban neighborhood. With substantial viewing distance from the beach and off-shore locations, intervening topography and vegetation, minimal topographic

change and project design features, and the locational context within the existing residential neighborhood, the project would be minimally visible and would not substantially change area views toward the urban area and distant mountains. The project incorporates siting location, site preparation/minimal topographic alteration, architectural design features, low-lying landscape, and public view corridor easement measures for maintaining the existing public ocean view corridor from the street.

Also as discussed above in items 3-6, project design refinements have been made to further minimize visibility and ensure visual compatibility, thereby further reducing the less than significant impact to views (project plans 04-25-16). The project and these design refinements comport with coastal policy direction for minimizing visibility and view effects by designing structures to blend into the natural setting through stepping buildings and breaking up the mass of structures, reducing heights, minimizing grading, protecting vegetation and incorporating landscape screening, and dedicating view corridor easements. Single Family Design Board comments at the May 2, 2016 concept review hearing indicated that the project size, height, stepped architecture, color palette to visually blend the structure into the setting, and landscape design and screening were reasonable and in keeping with City design guidelines for visual compatibility. The project is subject to further architecture and landscape design review approval per City design guidelines to ensure compatibility with the visual character of the neighborhood and coastal visual resources.

An alternatives analysis is not required for the CEQA document analysis; however, it is also clear that there is no feasible alternative location on the property for the proposed level of development. The parcel is a flag lot with the uppermost portion of the lot accommodating only the driveway. There is a limited area north of the 127 foot upper bluff step elevation of approximately 1312 square feet (105' x 12.5') which meets minimum factor of safety criteria for stability but which is not developable (a portion of the existing driveway, which is shared access with the adjacent parcel and is too narrow to provide for City development standards). There is a limited buildable area of approximately 740 square feet (20' x 37') above the 127 foot elevation between the driveway and proposed building envelope location, which would not be sufficient for a single-family residence and garage development at the proposed level of development, and does not meet factor of safety setback guidelines without stability devices. Moving the project further north would also increase its visibility and block the scenic ocean view in the public view corridor from the street. Decision-makers may however require further project refinements or require alternatives analysis as part of their assessment of policy consistency or as a basis for making findings for action on the project permit.

As demonstrated by the MND analysis, the project would not result in substantial changes to coastal visual resources in the area, including those associated with coastal scenic views, landform alteration, or onsite visual compatibility. The project would therefore not result in a significant visual impact or a considerable contribution to cumulative impacts to visual resources. The project could be found consistent with policies for protecting coastal visual resources.

The Coastal Commission comment does not provide new or conflicting facts as supporting evidence for their assessment of a substantial project impact and/or considerable contribution to a significant cumulative impact to coastal visual resources. The Coastal Commission comment indicates the opinion that any project visibility or incremental impact constitutes a significant project or cumulative impact or policy inconsistency. This is not supported by substantial evidence and does not meet the CEQA Guidelines or Lead Agency impact significance criteria of a substantial change to important scenic views or visual resources.

Consistent with case law, a conflict with a policy adopted for the purpose of avoiding or minimizing significant environmental impacts only constitutes a significant impact under CEQA if the conflict would result in a significant physical impact (*Lighthouse Field Beach Rescue v. City of Santa Cruz, 2005*). Based on the MND impact analysis compared with existing conditions, the project would result in incremental view changes and no significant impact or cumulative contribution associated with views, landform alteration, or visual compatibility, and could be found consistent with coastal policies for protecting visual resources. In the event of a decision-maker determination of project conflict with coastal visual resource policies, such a determination would not constitute a significant impact under CEQA.

The CEQA Guidelines provide that a disagreement among expert opinion is only applied as a basis for making an EIR determination in marginal cases after guidance about substantial evidence in §15064(f) is applied. In this case, application of §15064(f) criteria provides that there is substantial analysis and evidence supporting a conclusion that the project would clearly have only an incremental effect on important visual resources, and would not result in significant visual impacts or a considerable contribution to cumulative visual impacts.

Air Quality Impacts

8. Construction dust

Construction air quality controls. Comments request further specification of dust controls during grading and construction to be sure that dust does not affect neighbors (N. Brock 02-22-16, 05-02-16; S. & L. Wiscomb 3-6-16). The comment letter from the Air Pollution Control District (APCD) notes APCD standard dust control measures recommended for grading and construction; measures for diesel engines to reduce particulate matter and ozone precursors; and requirements that portable diesel construction engines rated 50 bhp or greater to have a PERP certificate or APCD permit prior to grading and building permit issuance (K. Nightingale 02-23-16).

Response: The MND (Initial Study section 2.b-d) addresses temporary dust and equipment emissions generated during project site stabilization, grading, and construction. The City Municipal Code (Building Code) specifies that construction activities implement APCD dust control measures. MND/IS Exhibit C identifies standard measures for dust control, construction equipment emissions, and portable diesel engines based on APCD standard measures, which would be applied to the project as conditions of permit approval. The impact analysis assumes implementation of these measures to reduce emissions, and the CalEEMod emissions calculation demonstrates that temporary construction emissions would not constitute a significant impact using the City and APCD guidelines. As discussed further in the Mitigation Monitoring and Reporting Program, the air quality provisions would be subject to monitoring for compliance throughout construction by a designated Project Environmental Coordinator (PEC) and City Community Development Department staff. Post-construction measures (e.g., revegetation) would be reviewed for compliance per adopted conditions of approval and prior to final inspection clearance for occupancy.

The MND/IS text discussion has been augmented to summarize the control measures identified in the Exhibit C standard conditions of approval, as follows:

Standard measures to reduce grading and construction-related dust and equipment emissions (MND Exhibit C) include water sprinklering (light surface watering for dust only; no subsurface saturation); minimizing disturbed areas; reduced on-site vehicle speeds; treatment of stockpiled soil; tarping of trucked soil; gravel pads at site access points; treatment of disturbed areas; designated dust monitor; registration/permit for portable diesel-powered construction equipment; regulations for off-road

diesel vehicles and mobile equipment; regulations for limiting duration of diesel vehicle engine idling; regulations for diesel engine emissions standards; replacement of diesel equipment with electric equipment when feasible; equipping diesel equipment with catalytic reduction, oxidation catalysts, and particulate filters when feasible; use of catalytic converters on gasoline-powered equipment when feasible; maintaining equipment in tune per manufacturers' specifications; using minimum practical engine sizes for construction equipment; minimizing number of construction equipment operating simultaneously; and reduction of construction worker trips through carpooling and providing lunch on site.

Biological Resources Impacts

9. Native Vegetation

Lemonade berry references. A comment asserts that references in the Mitigated Negative Declaration (MND) to existing and restored lemonade berry vegetation should use the term "horticultural" vegetation rather than "native" vegetation because onsite lemonade berry vegetation was relocated by the landslide or planted following post-landslide grading (Emprise Trust letter, 03-10-16).

Response: Project impacts associated with natural communities and native plants are addressed in the MND (Initial Study section 3.a and 3.e). The analysis identifies existing lemonade berry plants on the site as native vegetation and references restoration of native vegetation including lemonade berry. In the context of evaluating impacts of the project on important biological resources including existing native plant species, these references pertain to (1) recognizing the *existing status* of lemonade berry bushes on the site at the time CEQA environmental review was initiated, which is the salient factor for considering CEQA baseline conditions, not the timing of its establishment nor party who planted it; and (2) lemonade berry's characteristic as a primary *native plant species* within the coastal scrub and coastal bluff communities of native plants. The City General Plan Program EIR identifies these communities as consisting of low-growing semi-woody shrubs, limited evergreen species, and annual and perennial grasses located on the Mesa, Las Positas Valley, Parma Park, and Hope Ranch areas. In Santa Barbara, dominant native species in these communities include coyote brush (*Baccharis pilularis*), and California sagebrush (*Artemisia californica*), along with lemonade berry (*Rhus integrifolia*), white sage (*Salvia apiana*), black sage (*S. mellifera*), purple sage (*S. leucophylla*), and with ruderal species mixed in. MND/Initial Study references to "native vegetation" have been edited for clarification to read "native species vegetation" or "native plant species". The discussion of the importance of the on-site biological resources references the biologist characterization of the lemonade berry plants as a monoculture not exhibiting diversity of a complete scrub habitat ecosystem, and also recognizes that they contribute to larger area habitat values.

Geology Impacts

10. Temporary construction – slope stability and erosion hazards

Grading and construction effects on slope instability and erosion. Comments expressed concerns about the site's geologic hazards of unstable slopes and erosion, the previous landslide, and the potential for project site preparation and construction activities to result in significant geologic hazard impacts. Concerns include whether installation of slope stability measures (e.g., drilling for caissons, installation of shear pins and tie-backs), site grading, heavy equipment, and other construction activities could trigger a landslide, create erosion, cause underground utility breaks (water lines, Mesa sewer trunk line), affecting the stability and safety of areas outside of the project site (J. H. Taylor 02-22-16; D. &

M. Smith 02-22-16; J. Dorn 02-22-16; R. Stenson 02-22-16, 3-10-16; S. and L. Wiscomb 03-06-16; M. & J. Maybell 03-09-16; D. Crawford 03-10-16; Planning Commissioners).

Response: The MND (Initial Study section 5a.v, b, c) addresses short-term construction-related impacts associated with unstable slopes and erosion, based on project geotechnical, engineering, and hydrology reports which demonstrate that temporary activities for demolition of existing facilities on the site, grading and installation of slope stability devices, and project construction would not exacerbate geologic hazards or result in significant effects associated with unstable slopes or erosion.

Following the 1978 landslide, grading and other work in 1979 and 1984 to stabilize the slope did not trigger further landslide or result in significant effects associated with unstable slopes or erosion to the site or surrounding area. Data collection (inclinometer readings to detect subsurface movement) for the project geotechnical and engineering studies identified that since the 1984 grading and slope stability work, the site has been stable and not subject to further slide movement. Recent inclinometer readings on both the 1925 and 1921 El Camino de la Luz sites have confirmed that the slope has remained stable since May 2011. The inclinometers would be preserved for monitoring during the construction process to confirm that the site remains stable.

The project construction process has been designed to avoid the potential for significant geologic hazards to the site or neighboring sites as a result of heavy equipment, grading, drilling and installation of slope stability devices, and project construction. Installation of slope stability devices (shear pins and tie backs) would be done with drilling and poured in place construction, not pile driving. Limited grading would create a temporary bench cut for the drilling rig to drill the shear pins. The initial installation of shear pins would provide immediate slope stability due to increased shear resistance. The tiebacks would be drilled from the temporary bench cut supported by the shear pins. The shear pins and tie backs would improve stability of the site per industry safety factors such that heavy equipment, site grading, and construction would not trigger landslides, cause instability to off-site properties including the adjacent construction staging site, or cause breaks in the sewer main or other underground utilities.

With respect to concern about the Mesa Sewer Trunk line leaking, there is reference to potential prior leakage referenced in a post-landslide investigation report. However, Public Works staff has confirmed that the 10" sewer line that runs through the 1925 El Camino Del La Luz property was rehabilitated in 2006, and there is no evidence of current leakage. (D. Weaver 1978; N. Dall 03-10-16, L. Arroyo 2016).

11. Long-term slope stability

Long-term instability and erosion hazards. Comments expressed concerns about the project's potential for causing slope instability and erosion affecting surrounding area properties or coastal resources over the long-term. Comments referenced prior geologic studies that characterize the geological constraints to development. Concerns include effects from installing caissons into bedrock; heavy water retention tanks that could leak, and the potential need for future coastal armoring. Peer review of project technical studies was suggested. (M. and D. Smith 02-22-16; J. Dorn 02-22-16; Thompson & L. Phillips 02-24-16; S. and L. Wiscomb 03-06-16; M. & J. Maybell 03-09-16; M. Lyons 3-10-16; D. Crawford 03-10-16; Single-Family Design Board 02-22-16; Coastal Commission M. Sinkula 03-10-16; Planning Commissioners 03-03-16)

Response: The MND (Initial Study section 5a.v, b, c) analysis of long-term project impacts associated with unstable slopes and erosion was based on extensive project geotechnical, engineering, and

hydrology studies, which conclude that the project would not exacerbate these geologic hazards or result in significant long-term impacts associated with these geologic hazards.

Prior geological reports. Commenters referenced prior reports that identify the area as subject to unstable slopes and erosion, including the *City Safety Element Technical Report (Rodriguez, Campbell 2012)*; and reports associated with the 1984 Doolittle permit for landslide repair work (on 2001, 1933, & 1927 El Camino de la Luz), including *Preliminary Landslide Investigation Report (Pacific Materials Laboratory 1978)*, *Preliminary Landslide Hazards Evaluation (D. Weaver and Associates 1981)*, *Letters (Buena Engineers, Inc. 1983)*, and *Memoranda (Department of Conservation Division of Mines and Geology (1982-1983); Geologic Investigation of 2001 El Camino de la Luz (R. Coudray 1992); Buena report 1983.*

Response: The MND analysis identifies site conditions as subject to unstable slopes, including landslides and erosion, based on the City Master Environmental Assessment geological constraints maps and report (2009), the General Plan Program EIR (2011), the City Safety Element technical report and maps (2013), and the project technical reports.

The project geotechnical, engineering, and hydrology reports were based on detailed site-specific testing and investigations including on-site investigations, core samples and testing, analysis of other geologic studies (including those referenced by commenters), analysis of historic aerial photography in the area, and site monitors. The analysis provided project-specific analysis of the proposed development together with site stabilization and project design components, which informed the MND analysis of project impacts and mitigations. The project technical reports included *Geological and Geotechnical investigations and design review reports (Cotton, Sires and Associates, Inc. 2012, 2015, 2016)*; *Wave Run-Up and Coastal Hazard Analysis (GeoSoils, Inc. 2015)*; *Coastal Bluff Analysis (Scepan 2012)*; *shear pin calculations (C. L. Grant, Civil Engineer 2013)*; *Project Constraints Analysis (Dall & Associates 2015)*; *Hydrology Report (CSA 2015)*; and *Grading, Drainage, & Erosion Control Plans (C. L. Grant, Civil Engineer 2013, 2016).*

The prior geological reports referenced by commenters provide characterization of geological constraints for the area and site based on various levels of technical investigation data and analysis. The prior reports referenced by commenters serve to confirm information in the MND about geological constraints of the site, and do not conflict with the characterization of geologic constraints in the project technical reports. However, the prior reports did not include consideration of post-landslide work, nor analyze impacts of the specific project development proposal together with proposed site stabilization, drainage and erosion control, and vegetation components designed to avoid significant geological effects. The prior reports referenced by commenters do not address or refute the specific project impacts and mitigation analysis provided in the MND and project technical reports.

Several of the prior reports identify the bluff edge at the higher elevation near the street, which is different than stated in the project geological reports. This difference in interpretation of coastal bluff edge location does not change the analysis of physical environmental effects of the project, which is not addressed or disputed by these prior reports. The different assessments of bluff edge location is a matter informing decision-maker policy findings, but does not represent a differing opinion about the physical condition of the site or environmental effects of the project.

Long term slope stability and erosion effects on surrounding properties. Commenters expressed concern that the project could cause long-term destabilization of the slope affecting neighboring properties, including from caissons drilled into bedrock and heavy water retention tanks.

Response: The project geotechnical, engineering, and hydrology analyses as described in the response above (CSA 2012, 2013, 2015, 2016), which were based on extensive site investigation including core samples on the adjacent 1921 El Camino de la Luz site and were informed by other geological investigations of surrounding properties, demonstrate that the project slope stability components would improve stability of the site and surrounding area over the 75-year life of the project in comparison to existing conditions, and do not have the potential to destabilize the site or surrounding properties. The use of shear pins and tie backs anchored into bedrock is a proven engineering method for holding the slope together and establishing improved slope stability per industry safety standards, and does not have the potential to destabilize the subsurface geologic substructure.

The weight of water by volume is about half that of soil. The project geologist analysis concludes that the net loading of the water retention tanks would be less than if there were no tanks at all, and that the tanks would not have the potential to destabilize subsurface geology. The tanks are designed to avoid leakage and to withstand seismic events. Horizontal drains beneath the project would collect and pump any subsurface water in the event of any leakage, such that no significant erosion or stability effects would result.

Long-term cliff erosion, sea level rise, and future coastal armoring. Commenters express concerns that with ongoing cliff erosion and sea level rise below the project, the project could contribute to erosion and the need for future shoreline protective devices.

Response: The MND analysis identified no significant project impact associated with long-term cliff erosion, sea level rise, and coastal armoring. The MND analysis is based on project technical and design studies that identify that project slope stability, drainage controls, and vegetation components of the project would reduce erosion on the site compared to existing conditions.

Technical study of aerial photography of the period 1950-2010 (Scepan 2012) for erosion and landslide activity identified a net range of 10.5 to 33.0 feet southward reposition of the coastal bluff over the 60-year period, with the toe of the lower coastal bluff eroded at a net 4.0 to 6.8 feet during the period for an average annualized rate of 0.8 inches to 1.4 inches. The Wave Run Up Study (GeoSoils 2012) identified that within a few years following the landslide, marine processes reestablished the alignment of the lower coastal bluff relative to adjacent segments up and down the coast, with this analysis confirmed by CSA (2016) based on State photographic imagery (Department of Boating and Waterways and Division of Mines and Geology 1979-1993; CSA 2016).

The project would be located between the 80 foot and 130 foot elevations on the project site, 169 feet upslope (north) of the lower bluff step near the shore. The technical analyses demonstrate that with the low cliff retreat rates gradually increased by maximum scenarios of sea level rise by years 2050 and 2100, erosion of the lower bluff step would not reach the project development during its 75-year life. There is potential that wave run-up at the base of the cliff could potentially affect the stability of the larger landslide area. However, with the proposed project distance from the shoreline and the slope stability, drainage control, erosion control, and vegetation measures, wave run-up and cliff retreat would not represent factors affecting project safety, and the project development would not exacerbate erosion, cliff retreat, sand supply or other shoreline landforms, processes, resources, or hazards. As such, no shoreline protective devices such as seawalls, revetments, jetties, groins, or retaining walls would be required to protect the project during its 75-year life.

Peer review. Commenters suggested additional peer review of the project geotechnical analysis.

Response: The extensive project geological and geotechnical analyses were performed, prepared, and stamped by qualified professional experts registered by the State of California (geotechnical engineer

and engineering geologist of the firm Cotton, Shires & Associated, Inc.). The reports were reviewed by City staff of the Land Development Team (Planning Division and Building & Safety Division), and by the Staff Geologist of the California Coastal Commission. The Coastal Commission Staff Geologist identified a differing opinion on policy/bluff edge location issue but not on the geotechnical and safety analysis that supports the environmental impact conclusions. Further review and approval of the geotechnical reports by the Building & Safety Division will occur prior to issuance of a grading or building permit. The Municipal Code provides that supplemental engineering geology reports and data may be required as the Building Official may deem necessary, which may include additional peer review, and that recommendations of the project reports must be approved by the Building Official and incorporated in the project. Staff has determined that, based on the qualifications of the project technical experts, review of technical reports by the Coastal Commission geologist, and no submittal of substantial evidence refuting the environmental impact conclusions of the technical reports, no further peer review is required at this time.

12. Characterization of site constraints

Comments object to MND characterization of the project site as subject to slope instability and erosion and the statement that sea level rise could potentially increase coastal erosion, because the technical analyses conclude no significant project impacts (N. Dall 03-10-16).

Response: The MND impact analysis starts with identification of existing conditions and potential constraints before evaluating project impacts. The MND statements referenced describe that the site and surrounding area are subject to slope instability, erosion, and sea level rise constraints, based on numerous sources referenced including the City Master Environmental Assessment 2009, General Plan Program EIR 2011, and General Plan Safety Element (2012). The MND statement about sea level rise reflects numerous climate change studies and reports that recognize that forecasted effects of climate change on sea level rise and storm intensity have the potential for increasing rates of coastal erosion from increased storm surge and wave run-up (*UNCHFCCC Report 2015; California OPC 2012; Coastal Commission Sea Level Rise Guidelines 2015; City of Santa Barbara General Plan Program EIR 2011, Climate Action Plan 2012, and Safety Element 2013*).

The MND analysis goes on to recognize prior slope stability and revegetation work following the landslide, which improved stability and erosion conditions, and that the project as designed with slope stability, drainage control, erosion control, and vegetation components would further improve slope stability and safety and reduce drainage and erosion hazards. The analysis based on project technical studies identifies that with expected erosion rates assuming the high range of projected sea level rise and with the project location at a sufficient distance 169 feet upslope from the lower bluff step, the project as designed would not exacerbate erosion and slope stability hazards, the project would meet slope stability safety criteria, and no shoreline protection devices would be required for the life of the project.

13. Impacts from potential conflict with coastal policies.

Edge of bluff at 127 foot elevation and not 51 foot elevation. Comments assert that the top of bluff (bluff edge) should be determined at the 127 foot elevation using current Coastal Commission staff guidelines for applying coastal policies and regulations, and not at the 51 foot elevation identified by the project applicant. Comments maintain that with a bluff edge determination at 127 feet, the project is therefore being proposed on the bluff face and without appropriate safety setback from the edge of bluff, in conflict with coastal policies and regulations for development. Comments assert that this policy inconsistency for project location on the bluff face represents an environmental impact (B.

Peterson, 2-16-16; S. Knomme & J. Margan 2-16-16; S. and L. Wiscomb 3-6-16; M. Sinkula 03-10-16; Planning Commissioners 3-3-16)

Response: The MND (Initial Study section 5.a- b-c) addresses this issue. The determination of the bluff top or bluff edge location (terms used interchangeably) is a qualitative judgment based on consideration of the site topography and application of coastal regulations and guidelines. The purpose of determining the bluff edge location is for subsequently determining an appropriate development setback from the bluff edge, which is intended to direct development to more stable and safe locations and avoid the need for shoreline protective devices over the life of the project (such as seawalls, revetments, jetties, groins, or retaining walls). As is noted in the current Coastal Commission staff guidance document (*M. Johnsson, 2003*), for some sites, this judgment of bluff edge location can be open to differing interpretations. Due to unique variable topographic conditions in this area of the Mesa and the prior landslide on the project site, the project site topography is complicated, and more than one interpretation of bluff edge has been made by geologists analyzing the conditions. The project permit decision-makers make the final determination of bluff edge location for the project for purposes of policy consistency findings.

City Planning staff and Coastal Commission staff identified the bluff as having a step-like condition, with the edge of bluff at the upper step at 127 foot elevation. This bluff edge identification was based on substantial evidence, including review by City planning staff, Coastal Commission analyst, and Coastal Commission geologist (Dr. Mark Johnsson) of the site topography, submitted project plans and technical reports with surveyed topography, geotechnical studies, and hydrology analysis, a site visit by City staff and Coastal Commission staff analyst and Geologist, and analysis/application of the coastal bluff edge policies using current Coastal Commission regulations (*CCR Title 14 §13577*) and guidance (*Mark Johnsson, Establishing development setbacks from coastal bluffs, 2003*).

Additional information supporting this determination includes the following: *General Plan Program EIR* map (2011); *General Plan Safety Element* technical report map (2012); *City Master Environmental Assessment Maps* (2009); recent LiDAR-generated topographic data maps, utilizing remote sensing laser measurement of distance to identify earth contours, which demonstrate the unique pattern of coastal cliffs with multiple steps in this area of the Mesa (*Nares 2015 MND attachment; UCSB Bren 2015*); a contour map depicting the 500-foot distance consideration for making the determination (MND Exhibit F4); archive plan references for adjacent sites identifying top of bluff at the higher elevation (2001 El Camino de la Luz 1961 plans, 1933 El Camino de la Luz 1955 plans, 1909 El Camino de la Luz 1948 plans, 1903 El Camino de la Luz 1954 plans), and prior geologic reports for the area including the preliminary landslide investigation (Weaver 1981/Pacific Materials Laboratory 1978) which identified the landward edge of the landslide scarp at properties at 1839, 1903, 1909, 1919, 1921, 1925, 1927, 1933, and 2001 El Camino de la Luz and 2011 Edgewater Way; and a geologic investigation of 2001 El Camino de la Luz which identified the landslide headscarp as the bluff (R. Coudray 1992).

With a determination of the bluff edge at the 127 foot elevation, the project would be located on the bluff face and therefore, would not provide a development setback from the bluff edge. As such, the MND identifies the project as potentially in conflict with LCP policy 8.2 which precludes most development on the bluff face, and Coastal Act policies, regulations, and guidelines which direct development to be set back from the bluff edge and areas meeting minimum factors of safety for slope stability.

In accordance with California case law, for purposes of CEQA environmental impact review, a project inconsistency with a policy adopted for the purposes of avoiding or reducing environmental effects

represents a significant environmental impact only if the policy conflict results in a significant environmental impact (*Lighthouse Field Beach Rescue v. City of Santa Cruz, 2005*).

The MND analysis, using conservative assumptions, demonstrates that the project at its proposed location and with design components for slope stabilization to meet factor of safety criteria would not exacerbate existing geologic hazards, would improve slope stability and drainage control and reduce existing overland erosion hazards compared to existing conditions, and would not result in significant geologic impacts associated with the temporary grading and construction process, long-term slope stability/safety of the site or surrounding area, or long-term erosion or the need for shoreline protection devices. This is true whether the bluff edge is determined to be located at the 51 foot elevation or 127 foot elevation. Therefore, the potential policy conflict associated with a bluff edge determination at the 127 foot elevation is a policy matter relevant to decision-maker action on the project permit, but does not constitute a significant environmental impact under CEQA.

Edge of bluff at 51 foot elevation and not at 127 foot elevation. Comments assert that the top of bluff should be determined at the 51 foot elevation and not the 127 foot elevation (N. Dall.03-10-16).

(1) Supporting Evidence. The comments note that the determination of bluff edge at the 51 foot elevation is based on a detailed project technical report analysis including historical mapping, aerial photos, and site investigation for surveyed results (Scepan 2012; CSA 2016), which identifies the cliff to be rounded away, with the bluff edge at the 51 foot elevation and no upper step or bluff edge existing, while the staff determination for a bluff edge at 127 foot elevation was not based on a similarly adequate detailed analysis.

Response: As noted in the response above, the City and Coastal Commission staff determination of bluff edge at the 127 foot elevation was based on substantial evidence and analysis, including expert geologist review of topography, project plans, and technical reports, site visits, and analysis applying coastal bluff edge determination guidance. The following Coastal Commission staff communication with City staff (*Megan Sinkula, Coastal Program Analyst, 05-02-16 email*) further clarifies this point with respect to review by Coastal Commission Staff Geologist Mark Johnsson and his bluff edge determination:

“...Dr. Johnsson has consulted with the City on numerous occasions regarding the geological issues of the proposed project, visited the proposed site with the City, reviewed the “Geologic and Geotechnical Investigation Report” (CSA, 2012), the “Update Report and Response to City Review Team Comments” (CSA, 2015), as well as the “Supplemental Geological Response and Hydrological Response to City of Santa Barbara Planning Division Letter” dated December 8, 2015 (CSA, 2016), as well as other geologic reports dealing with the geology of the site and nearby environs. Furthermore, Dr. Johnsson has visited the site to observe conditions directly. Dr. Johnsson has, therefore, provided an expert opinion based upon extensive review of the proposed project location and all geologic reports generated for the proposed development, collaboration with the City’s analysts and personal expertise from performing many determinations of bluff topographic expression — all before the project has come before the Commission.”

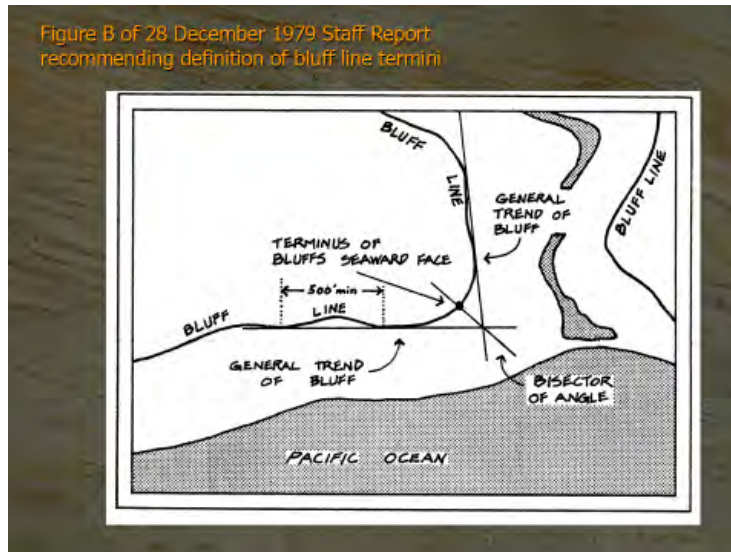
(2) 500 foot distance criterion. The comments assert that the 51 foot elevation for bluff edge would meet the CCR Title 14 §13577 regulation for determining bluff edge, including that the bluff edge distance would meet and exceed the 500-foot criterion, while the landslide headscarp at 127 foot elevation identified by staff would not meet the 500-foot distance criteria of the CCR bluff edge regulation for identifying a bluff edge and cannot be determined to be the bluff edge.

Response: Coastal Commission staff communication to City staff (*Megan Sinkula, Coastal Program Analyst, 04-20-16, 05-02-16 emails*) confirmed that the 500 foot criterion in CCR 13577 refers to the minimum area to be examined in making a coastal bluff determination, and not the minimum length of a coastal bluff or bluff edge, and that the criterion is used only in distinguishing between the coastal bluff and canyon bluffs. MND Exhibit F4 indicates the 500 foot area considered.

Communication to City staff from Coastal Commission staff (*Megan Sinkula, Coastal Program Analyst, 05-02-16 email*) further explains Dr. Johnsson's analysis for bluff edge determination at the 127 foot elevation with respect to the 500 foot coastal regulation criteria:

"...Coastal Commission Regulations Section 13577 states, in relevant part: The termini of the bluff line, or edge along the seaward face of the bluff, shall be defined as a point reached by bisecting the angle formed by a line coinciding with the general trend of the bluff line along the seaward face of the bluff, and a line coinciding with the general trend of the bluff line along the inland facing portion of the bluff. Five hundred feet shall be the minimum length of bluff line or edge to be used in making these determinations."

"This language is best understood by referring to the figure that accompanied the 1979 Staff Report adopting the regulation (Section 13577)."



"As can be seen, the 500-foot (minimum) trend line is used to define the general trend of the coastal bluff as opposed to a canyon or fluvial-facing bluff. The point on the bluff reached by the line bisecting the angle formed by the coastal bluff trend line and the canyon bluff trend line is the point at which a coastal bluff transitions to a canyon bluff. The 500-foot criterion is meant to assure that minor indentations in a coastal bluff do not constitute a transition to a canyon bluff. That is the only significance of a 500-foot criterion. This language does *not* pertain to whether a landslide scarp constitutes part of a coastal bluff (i.e., some minimum length of bluff needed for a landslide scarp to constitute a coastal bluff.)"

"Therefore, as Dr. Johnsson has provided in his professional opinion, the landslide scarp at 1925 El Camino De La Luz clearly constitutes a coastal bluff edge at this location. The original bluff edge was destroyed by the landslide, and a new bluff edge was established at the headscarp of the landslide."

(3) Bluff determination guidelines. The comments note that the 51 foot elevation bluff edge location would conform to applicable bluff guidelines (Geologic Stability of Blufftop Development, 1997) which were adopted by the CA Coastal Commission and referenced in the current adopted City Local Coastal Plan, while the staff analysis used the Mark Johnsson staff memo guidelines (2003), which were not adopted by the Coastal Commission and are not applicable to the project.

Response: The 1997 *Geologic Stability of Blufftop Development* guidelines were part of the Coastal Commission's Statewide Interpretive Guidelines and provided guidance at the time the City's Local Coastal Plan (LCP) was adopted (1981), but were not an LCP attachment nor referenced in the LCP geologic discussion or policies, and are currently outdated. The Mark Johnsson guidelines (*Establishing development setbacks from coastal bluffs, 2003*) provide the current methodology and standard of practice employed by Coastal Commission staff in evaluating setbacks for bluff top development to inform the Coastal Commission, local agencies, and public on application of coastal bluff development policies and regulations to development permit decisions across the state, as noted in the guidelines and confirmed by Coastal Commission staff (*M. Sinkula, 05/02/16*).

(4) Prior Coastal Commission decisions. The comments assert that the 51 foot bluff edge determination would be consistent with the Coastal Commission regulation (PRC 30625(c)) that "decisions of the (Coastal) Commission where applicable shall guide local governments ...in their future actions", given that prior Coastal Commission permits for grading and slope restoration in the project vicinity following the landslide identified the work to be inland of the beach and bluff edge and seaward of residences thereby recognizing the lower bluff edge location. The comments state that a staff bluff edge determination at 127 foot elevation would conflict with the Coastal Commission Doolittle permit findings for bluff edge and therefore the Coastal regulation for local governments to follow prior Coastal Commission guidance.

The prior Coastal Commission permit issued to Doolittle (for sites 2001, 1927, and 1933 El Camino de la Luz) was for limited slope stability repair work following the landslide, and associated findings do not represent binding precedent for new development of a residence on the project site at 1925 El Camino de la Luz. The technical and staff reports for the Doolittle permit clearly state that further analysis and permits would be required for proposed residential development in the area. Analysis for the current permit application appropriately uses the current 2003 Coastal Commission staff guidance for development on coastal bluffs for identification of the bluff edge.

14. Coastal Commission comment about geologic hazards

Impacts associated with geologic hazards. Comments received by Coastal Commission staff included a general statement characterizing geologic resources impact significance, and referencing coastal policies for protection of public safety and coastal resources, with the opinion stated that the project would conflict with these policies, which would constitute a significant impact. (*M. Sinkula 03-10-16*).

Response: In a change to CEQA, the recent Supreme Court opinion (*CA Building Industry Association v. Bay Area Air Quality Management District 12-17-15*) held that CEQA generally does not require an agency to consider the effects of existing environmental conditions such as geologic hazards on future residents, except for the potential for the project to exacerbate existing environmental conditions.

The MND (Initial Study section 1) does address the impact significance of project effects associated with geologic hazards and public safety. The analysis identified potentially significant impacts associated with slope instability and erosion. Substantial technical evidence and analysis is provided that supports the conclusion that the project as designed with slope stability and drainage and erosion control elements would improve landform stability, erosion, and drainage conditions compared to

existing conditions and would not exacerbate hazards or result in significant safety or other geologic impacts to the project, surrounding properties, or coastal resources.

The Coastal Commission staff comment does not provide new factual information or other substantial evidence in support of a conclusion of significant impacts. And, as noted in the MND, under CEQA case law, a policy inconsistency only constitutes a significant impact under CEQA if the policy conflict would result in a significant impact. The MND identifies the potential for decision makers to find the project in conflict with coastal policies about development on a bluff face and for incorporating development setbacks from the bluff edge and areas meeting stability factors of safety. Based on the impact analysis, a policy conflict in this instance would not constitute a significant environmental impact for CEQA review purposes.

15. Other geologic constraints

The comment questions potential for environmental effects associated with other geologic-related hazards including seismicity and liquefaction (Planning Commissioner 03-03-16).

Response: The MND addresses this issue (Initial Study Section 5.a). Geologic formations on the project site are identified as landslide deposits on the lower slope, Monterey Formation mid-slope, and Quaternary Marine Terrace deposits at the upper portion of the property nearest the street. The site is outside identified earthquake fault hazard zones. All California is subject to earthquake ground shaking, and State and City Building Code provisions require appropriate structural design to address ground shaking. The site is identified for low potential for liquefaction (loss of soil strength during earthquake shaking) and expansive soils. The site is not identified with geologic substructure subject to radon hazard. In the event final technical studies prior to building permits identify these risk in any area of the building envelope, building code regulations are in place to adequately address the issues through site design, structural design, and barriers. The project does not have the potential to exacerbate seismic and geologic hazards exposing persons and structures to risk of earthquake fault rupture, earthquake ground shaking, liquefaction, expansive soils, or radon impacts, constituting a less than significant project impact. (*City Master Environmental Assessment and Safety Element maps and guidelines, and project geologic hazard studies*)

Noise Impacts

16. Construction-related noise

Temporary noise impacts and controls. Comments expressed concern about the impact of construction-related noise and vibration on the surrounding neighborhood. Sources of noise referenced included heavy equipment, excavation, pile driving, drilling, trenching, paving, and traffic. Potential noise and vibration impacts raised include disturbance to neighbors, damage to neighbors' hearing, and property damage such as cracked pipes, walls, or foundations, and broken glass. Comments pertaining to noise controls suggested further specification of noise controls; a limitation on the overall duration of the construction process; revised construction hours to start later than 7:00 a.m.; and further detail on advance notification to neighbors and monitoring of noise. (N. Brock 02-22-16, 05-02-16; J. H. Taylor 02-22-16; R. Stenson 02-22-16; S. and L. Wiscomb 03-06-16; M. & J. Maybell 03-09-16; D. Crawford 03-10-16)

Response: Temporary construction-related noise and vibration is addressed in the MND (Initial Study section 7.a, c). The project scope is limited to site preparation and construction of a single residence. Overall duration of the construction process is estimated at 70 weeks (1.3 years) including up to four weeks of demolition and six weeks of site grading.

The MND/Initial Study analysis identifies a potentially significant impact to the surrounding neighborhood associated with temporary grading and construction equipment noise and vibration. Higher noise levels (>80 dBA at 50 feet) and vibration are associated with some processes, such as heavy equipment and vehicles, drilling for poured in place caissons to stabilize slopes, grading, and jack hammers for demolition of existing pavement. (Note that the project does not include pile driving for caisson installation.) These higher noise levels are intermittent and periodic and are limited in overall duration.

Construction processes are regulated through City ordinances and building permit provisions. Requirements of the Santa Barbara Municipal Code Noise Ordinance provide limitations on noise-generating construction equipment to the hours of 7:00 a.m. to 8:00 p.m.

With application of identified mitigation measures N-1 through N-3 further limiting construction days (weekdays only) and hours (to end at 4:00 p.m.) for high noise-generating construction processes, requirements for construction equipment sound controls, and neighbor notification 20 days prior to commencement of the construction process, temporary construction-related noise and vibration impacts of the project would be less than significant. In addition, a pre-construction meeting with contractors is held to review noise mitigation requirements, and monitoring of the implementation of mitigation measures is required by an approved project environmental coordinator (PEC) [see attached Mitigation Monitoring and Reporting Program (MMRP)] with bi-weekly reporting to City staff.

Recommended Measures

The project site is located in a quiet residential neighborhood. The following additional measures have been added to the MND as recommended measures that could be applied to the project toward further reducing the less than significant construction-related noise and vibration impacts. As determined necessary to implement noise policies and make required findings for permit approval, the following additional Recommended Measures could be required by decision-makers as project conditions of approval to further limit construction hours, further specify sound controls and neighborhood notification, add sound barriers, and conduct a building cracks survey.

RM N-4 *Further Construction Hours Limitations.* Requirements in mitigation measure N-1 are superseded by the following provisions: All construction activities shall be prohibited on weekends and shall be permitted only on weekdays between the hours of 8:00 a.m. and 4:00, with the exception of ten specified holidays when construction activities shall also be prohibited: New Year's Day (January 1st); Martin Luther King Jr Day (3rd Monday in January); President's Day (3rd Monday in February); Memorial Day (Last Monday in May); Independence Day (July 4th); Labor Day (1st Monday in September); Thanksgiving Day (4th Thursday in November); Day Following Thanksgiving Day (Friday following Thanksgiving); Christmas Day (December 25th). **When a holiday falls on a Saturday or Sunday, the preceding Friday or following Monday respectively shall be observed as a legal holiday.*

RM N-5 *Use of Construction Equipment Sound Controls.* Requirements in mitigation measure N-2 are further specified as follows: Equipment and vehicle mufflers and silencing devices shall be operating whenever equipment and vehicles are in use for the project. All diesel equipment shall be operated with closed engine doors. Unnecessary idling of internal combustion engines shall be prohibited during project construction processes. Whenever feasible, electrical power shall be used to run air compressors and similar power tools.

- RM N-6 *Neighbor Notification Specifications.* Requirements in mitigation measure N-3 are augmented as follows: Additional notification of neighbors within 300 feet of the project area shall be provided one week prior to a changed construction schedule. A sign (with minimum font size of 0.5 inch) with the information required by mitigation measure N-1 shall be posted at the point of entry to the site immediately upon building permit issuance and upon any subsequent update notifications.
- RM N-7 *Construction Noise Barriers.* Stationary construction equipment that generates noise exceeding 50 dBA at the property boundary shall be shielded with a barrier that meets a sound transmission class (STC) rating of 25. Air compressors and generators used for construction shall be surrounded by temporary acoustical shelters.
- RM N-8 *Structural Crack Survey and Video Reconnaissance.* At least twenty (20) days prior to the issuance of a demolition permit, Owner shall notify owners and occupants of structures within 300 feet of the project site property lines of the opportunity to participate in a structural crack survey and video reconnaissance of their property. Prior to the issuance of a demolition permit, Owner shall prepare a structural crack survey and video reconnaissance of the property of those owners or occupants who express a desire to participate in the survey. The purpose of the survey shall be to document the existing condition of neighboring structures within 300 feet of the project site property line and more than 30 years old. After each major phase of project development (demolition, grading, and construction), a follow-up structural crack survey and video reconnaissance of the property of those owners and occupants who elected to participate in the survey shall be prepared. Prior to issuance of a certificate of occupancy, Owner shall meet with the owners and occupants who elected to participate in the survey to determine whether any structural damage has occurred due to demolition, grading or construction at the project site. Prior to issuance of certificate of occupancy, Owner shall provide for prior two-week neighbor notification and video documentation of post-construction condition of buildings and other structures, and shall compensate any neighbors for repair of cracks caused by the construction process.

Recreation Impacts

17. Beach access and open space easements

Comments request clarification of proposed access and open space easements and question their identification as beneficial to coastal recreational resources (Planning Commissioner 03-03-16)

Response: The project site includes the back beach area from the lower cliff to the Mean High Tide Line. A recorded private access easement exists that provided for a former footpath from 1927 El Camino de la Luz across 1925 El Camino de la Luz to the beach (*Preliminary Title Report, 2015*). The path no longer exists due to the landslide. The general alignment identified for the proposed California Coastal Trail along the West Mesa includes the beach and closest roads parallel to the coast. The back beach area of the parcel is included within this general identified trail alignment.

The project proposal includes an offer to dedicate a lateral public access easement across the back beach area to the Mean High Tide Line. There is no proposal for a vertical easement from the public beach up to the project site. An offer to dedicate an open space easement over the undeveloped area is also proposed as part of the project, which includes the area below the project development envelope to the coastline.

The easements provide permanent recorded legal assurances of public access across the back beach area, and preservation of vegetated open space and habitat on the site, which is also part of the visual open space backdrop of the public beach and ocean recreational areas. These legal assurances are beneficial to the public beach, coastal trail, and open space recreational resources of this area of the coast.

Traffic Impacts

18. Construction traffic

Impacts to neighborhood. Comment expressed a concern for construction-related traffic in the neighborhood (D. Crawford 03-10-16)

Response: Construction-related traffic impacts of the project are addressed in MND/Initial Study section 11.b. The project is limited to site preparation and construction of one residence. Existing area traffic levels are low.

Traffic generated by the project during the construction process will vary during different phases of work and will include worker trips, deliveries of equipment and materials, and removal of demolition debris and construction waste materials. The project proposes construction equipment and materials staging on the project site and adjacent property at 1921 El Camino de la Luz.

The project would be subject to standard conditions of approval (MND/Initial Study Exhibit C) restricting construction truck trips to outside of peak traffic hours; requiring approval of routes for construction traffic; and requiring approval of specific designated construction staging and parking areas.

Construction-related traffic is temporary and limited and may represent an inconvenience but does not constitute a significant traffic impact per City impact significance thresholds.

Water Quality and Hydrology Impacts

19. Construction process - drainage and water quality

Construction impacts to water quality. Comments expressed concerns that the project grading and construction process could cause runoff affecting surrounding properties, or could pollute run-off or groundwater with dust, metals, construction contaminants, leaking of drilling fluids, or landslide debris. Additional detail on temporary drainage and water quality controls was requested (J. Dorn 02-22-16; Single Family Design Board 02-22-16; S. and L. Wiscomb 03-06-16; Planning Commissioners 03-03-16).

Response: The MND/Initial Study section 12.b-d addresses temporary grading and construction-related impacts associated with drainage and water quality. Coastal Commission regulations and City plans and ordinances require implementation of an approved drainage and storm water management plan for temporary construction activities throughout the project site demolition, stabilization, grading, construction, and landscaping process. The approved plan identifies controls to assure that the construction process would not result in significant temporary impacts associated with drainage, erosion, storm water, groundwater, and water quality. The City Erosion/Sedimentation Control Program (*Building & Safety Division, 2012*) identifies control measures to be included in such plans. Best management practices provide for containment procedures in the event of accidents or spills. Standard air quality conditions of approval also require all equipment to be maintained.

Measures incorporated in the preliminary drainage and erosion control plan for the project construction process (Project plans sheets A0.01 and .02 Construction Drainage Plan and Drainage

Notes; and Drainage and Erosion Control Plan and Grading Plan, 1925 El Camino de la Luz (C. L. Grant, *Civil Engineer*, 2013) include the following: gravel entrance; filter system on catch basin at El Camino de la Luz cul-de-sac and parking areas; control of erosion and drainage with use of silt fencing, straw wattles, fabric wattles, hay bales, plastic sheeting; vegetation protection with temporary jute netting with pins. The plan is subject to review and approval as part of the project by Planning and Creeks Division staff, Planning Commission, and Single Family Design Board. The final plan is subject to review and approval prior to issuance of a grading and building permit, and plan provisions would be monitored by a Project Environmental Coordinator during the construction process as part of the Monitoring and Reporting Plan (attached to MND).

MND/Initial Study sections 9 and 6 address removal of landslide debris within the project development envelope and any hazardous materials identified during the site preparation or construction process. Landslide debris removal would be directed, monitored, and inspected by a licensed geotechnical engineer as a standard requirement of the building permit. Proper disposal of any hazardous materials discovered is required and governed by State regulations. OSHA worker site safety procedures are also standard construction contractor provisions.

20. Long-term - drainage and water quality

Storm water management. Comments requested more detail about the long-term storm water management program for the project, and expressed concerns that the project could adversely affect surrounding properties due to inadequate maintenance of storm water management devices; and potential loading or earthquake cracking of water tanks (J. Dorn 02-22-16; Single Family Design Board 02-22-16; M. Sinkula, Coastal Commission 03-10-16).

Response: Long-term drainage and water quality management is addressed in the MND (Initial Study section 12.b-d). The project would result in approximately 7,000 square feet of impervious surface and would retain approximately two-thirds of the site as natural open space. State and City policies and regulations require that onsite capture, retention, and treatment of storm water to manage volume and water quality be incorporated into the project. Increased storm water (based on 25-year storm) is captured and retained on site (for a one-inch storm event over 24 hour period) and treated using best management practices (BMP). Project technical reports (CSA 2012, 2015, 2016) provide evaluation of project hydrology and design of on-site drainage facilities and storm water management plans to be installed as part of the project, and project plans (Plan sheet CD-1, 4-25-15) provide the drainage plan. The City Creeks Division has reviewed the current project storm water management plan (SWMP) and concluded that the plans could comply with City Tier 3 SWMP requirements for run-off volumes, water quality treatment, and BMPs. Final plans would be approved prior to issuance of a grading and building permit and installation of SWMP measures prior to final project inspection. The City provides annual reports to the State on implementation of post-construction SWMP measures.

A recommended measure has been added to the FMND to the MND as follows to further ensure implementation of approved plans for drainage facilities and storm water management:

WQH-1 *Drainage and Storm Water Management Facilities and Plans.* Final project plans shall incorporate project components for construction and post-construction permanent drainage and storm water management facilities and operation/maintenance provisions reflecting technical study recommendations and consistent with City policies, ordinances, and guidelines for construction erosion and sediment control, and permanent storm water management addressing water volumes and water quality.

The MND analysis demonstrates that the project would improve long-term drainage and water quality treatment on the site compared with current conditions. The drainage plan would provide for control of all surface water within the grading and development envelope to avoid landform saturation, reduce erosion, and reduce high pore water pressures. On-site drainage facilities would include three horizontal below grade drains connected to three on-site water storage tanks (total capacity >36,000 gallons), back drains behind retaining walls, and residence sub-floor sub-drains, along with vegetation restoration, landscaping, and roof gardens. Drainage from subareas of the property would be collected in inlet and trench drain devices and directed to on-site subsurface water storage tanks, used for on-site maintenance of lemondade berry restoration areas and landscaping, and any excess water pumped back to the El Camino de la Luz municipal storm drain. Drainage for two small areas (driveway area) would continue to be directed to the adjacent property 1921 El Camino de la Luz with a permanent drainage easement, but with volume reduced through collection of a portion from the project site directed to on-site drain inlet and trench drain collection devices. The site geology is not appropriate for use of infiltration methods for water quality treatment, and the project would utilize filtration on drain inlets and trench drains, UV light treatment or similar method for water tanks, native vegetation to minimize sediment, nutrients, and pesticides, and sweeping of paved areas. On-going maintenance of SWMP facilities and practices is a standard permit requirement.

The proposed subsurface tanks are designed to not leak and to withstand seismic ground shaking. Water weighs about half the weight of a comparable volume of soil. The project geologist analysis concludes that the placement of the water tanks would not result in net weight loading or have the potential to destabilize the site (CSA, 2016).

21. Environmental document type

Mitigated negative declaration vs. environmental impact report. Comments suggest that an environmental impact report rather than mitigated negative declaration should be prepared as the project environmental document. (M.T. Lyons 03-10-16; Planning Commissioners 03-03-16)

Response: The CEQA and the State CEQA Guidelines provide direction and criteria for Lead Agency determinations of the appropriate type of environmental review document for a given project. An Environmental Impact Report is prepared if there is substantial evidence that the project may have a significant environmental effect. A Mitigated Negative Declaration shall be prepared when project plans and mitigation measures agreed-to by the project applicant would avoid or mitigate potentially significant environmental effects such that clearly no significant effects would result, and there is no substantial evidence in the record that the project may have a significant environmental effect.

Public comment on the draft Mitigated Negative Declaration analysis of project environmental effects stated concerns about project impacts, but provided no substantial evidence that a significant impact may occur. The evidence in the record clearly demonstrates that environmental impacts of the project as proposed would not be significant, or would be mitigated to a less than significant level by mitigation measures agreed-to by the project applicant. There is no substantial evidence in the record to support a finding that the project may result in a significant effect on the environment.

22. Mandatory Findings of Significance

Supporting Evidence. Clarify basis for mandatory findings of significance with further text indicating evidence supporting the findings (Planning Commissioners 03-03-16).

Response: The MND states that the findings are supported by the analysis throughout the MND. Additional text summarizing the MND analysis and supporting the findings has been added to the FMND.

Applicant Technical Comments

23. Project Description. *Change reference from native vegetation to horticultural vegetation; include reference to proposed temporary construction staging area on 1921 El Camino de la Luz; clarify manner of shear-pin and caisson installation. (N. Dall, 03-10-16 technical comments attachment)*

Response:

Native Vegetation. Please see item 9. “Native” refers to plant species indigenous to the area, which is not changed by when the vegetation was established on the site or who established it. The text reference has been clarified to reference “native species”.

Construction Staging. Please see item 2. A reference to the proposed temporary construction staging area at 1921 El Camino de la Luz has been added to the MND cover sheet summary project description. The DMND full project description included reference to the proposed temporary construction staging area at 1921 El Camino de la Luz based on information provided in the project application. This text description has been augmented in the proposed FMND to reflect additional detail provided with the refined project plans submitted by the applicant (04-25-16 plans).

Installation of caissons and shear pins. The FMND cover sheet summary project description and the FMND full project description have been augmented to state “using drilling and poured in place construction rather than pile driving”.

24. Environmental Setting. *Revise characterizations of coastal bluff; use Mean Lower Low Water elevation as reference in describing parcel boundary; change references to identify lemonade berry as a horticultural species and not native species; clarify reference to tsunami run-up area; correct references to post-landslide activities on the site in 1978 and 1984. (N. Dall, 03-10-16 technical comments attachment)*

Response:

Coastal bluff characterization. The commenter’s opinion about the location of bluff edge and applicable guidelines for interpreting coastal policies and regulations is noted, and was already summarized in the DMND discussion and in prior responses to comment. Please see item 13 response. The proposed FMND descriptions of existing environmental setting and Geology section impact discussion are edited but continue to recognize that the parcel has complex step-like topography which includes a lower tier cliff near the shoreline and a long bluff sloping up to an upper tier step at the landslide head scarp, consistent with expert opinion of the Coastal Commission staff geologist based on substantial evidence as described, and current guidelines used by the Coastal Commission and City and their staffs for evaluating development setbacks from coastal bluffs and applying coastal development regulations and policies (*M. Johnsson, Establishing development setbacks from coastal bluffs, 2003*).

Water elevation reference. The MND discussion referenced which describes parcel topography for purposes of environmental impact analysis will continue to describe parcel location and boundaries with reference to Mean High Tide Line, which is the measure used routinely by agencies in Santa Barbara County, with the elevation corrected to 4.63 feet. It is noted that these descriptions for environmental review purposes do not represent jurisdictional boundary determinations.

Native species references. Please see item 9 response above. The text provides a brief summary describing native species vegetation existing on the site for the purpose of identifying baseline environmental conditions. Text references have been clarified.

Tsunami run-up area. The text in the proposed FMND has been revised to clarify that the identified tsunami run-up area (City MEA 2009) is identified for the lower portion of the project site below the 51 feet elevation of the lower bluff step, and that the project development envelope is outside the identified risk zone.

Post-landslide activities. The text in the proposed FMND has been revised to clarify references to post-landslide activities in 1978 and 1984 for this brief summary description of the environmental setting, and later in the Geology impacts discussion.

- 25. Existing Land Use, Access, and Parking.** Delete use of term “vacant” and clarify existing on-site development and homeless use; include reference to California Coastal Trail alignment and recorded private access easement along back beach area of the parcel. (N. Dall, 03-10-16 technical comments attachment)

Response:

Land use description. The text in the proposed FMND summary of existing land use on the site has been revised to clarify existing on-site remnant development, and added references that the site has no existing residential dwelling or active residential use, and that the site near the lower bluff step has reportedly had unauthorized use by an encampment of homeless persons.

Coastal Trail. The proposed FMND access description and Recreation section have been revised to include references to the general trail alignment and recorded private access easement along the back beach area of the project site. Please see item 17 response.

- 26. Plans and Policies discussion.** Revise discussion of coastal bluff edge policies to recognize bluff edge at 51 foot elevation and not 127 foot elevation. (N. Dall, 03-10-16 technical comments attachment)

Response: *Bluff edge.* The MND (Initial Study section 5.a- b-c) addresses this issue. Please see item 13 response. The commenter’s opinion about the location of bluff edge and applicable guidelines for interpreting coastal policies and regulations is noted, and is already summarized in the MND discussion.

- 27. Note on Supreme Court case opinion.** Clarify discussion regarding CEQA document scope of review. (N. Dall, 03-10-16 technical comments attachment)

Response: *CEQA note.* The proposed FMND text is augmented to clarify that the MND/Initial Study document analysis includes full evaluation of impacts associated with environmental hazards. (N. Dall, 03-10-16 technical comments attachment)

- 28. Visual Resources.** Clarify discussion of view impacts from viewing locations on the beach and ocean. (N. Dall, 03-10-16 technical comments attachment)

Response: *View impacts.* The text discussion in the proposed FMND has been augmented to clarify analysis of project impacts to views from the beach and ocean, with more detail about the existing context of the view and the topographic, vegetation, and project design factors that minimize project visual effects, including project design refinements submitted by the applicant (04-25-16) in response to the comments from the Single Family Design Board concept review.

- 29. Lighting and Glare.** Clarify discussion of project components. (N. Dall, 03-10-16 technical comments attachment)

Response: *Lighting effects.* The proposed FMND text discussion has been revised to clarify project components, reference required Single Family Design Board approval of project materials and lighting design, and identify design refinements submitted (04-25-16 project plans) that would further reduce

any potential glare impacts. A Recommended Measure has been added specifying that design review approvals by the Single Family Design Board would include approval of a project lighting plan.

- 30. *Biological Communities.*** *Clarify location references for coastal bluff scrub vegetation and proposed open space easement; revise references to natural community because plants are horticultural; correct analysis that project would not remove any coastal bluff vegetation or cliff aster; include reference to project mitigation of the impact by homeless persons on vegetation. (N. Dall, 03-10-16 technical comments attachment)*

Response: *Native plant impacts and mitigation.* The text in the proposed FMND Biological section has been revised to clarify the location of the open space easement which is proposed as a component of the project and habitat areas to be protected by the easement; existing native species vegetation and project effects; and to include reference to project mitigation of existing vegetation damage due to unauthorized use of the property.

- 31. *Geology and Soils, Existing Site Conditions.*** *Correct parcel elevations; characterizations of physical processes per technical studies, effects of sea level rise on bluff erosion rate, unsubstantiated references to lower sea cliff and lower bluff location, and setback/factor of safety references for slope stability and erosion discussion; and delete identification of potential policy conflicts based on unsubstantiated bluff edge location at the landslide head scarp. (N. Dall, 03-10-16 technical comments attachment)*

Response:

Parcel elevations. Please see item 23 response. The parcel elevations utilize reference to Mean High Tide Line, and the shoreline elevation has been corrected.

Physical processes. The impact analysis starts with identification of existing conditions and constraints before evaluating project impacts. The statements referenced describing the site and surrounding area as subject to slope instability and bluff erosion constraints are based on numerous sources referenced including the City *Master Environmental Assessment (2009)*, *General Plan Program EIR (2011)*, and *General Plan Safety Element (2012)*, as well as the project technical studies. No text change is required.

The MND analysis then goes on to recognize prior slope stability and revegetation work following the landslide which improved stability and erosion conditions, and that the project as designed with slope stability, drainage control, erosion control, and vegetation components would further improve slope stability and safety and reduce drainage and erosion hazards. The analysis based on project technical studies identifies that with expected erosion rates assuming the high range of projected sea level rise and with the project location at sufficient distance 169 feet upslope from the lower cliff, the project as designed would not exacerbate erosion and slope stability hazards, the project would meet safety criteria for the project, and no shoreline protection devices would be required for the life of the project.

Bluff erosion and sea level rise. Per the DMND discussion of existing site constraints states, *historic and current* rates of coastal cliff erosion are first identified, based on the project technical reports. It is noted that sea level rise may result in increased erosion rates from increased frequency and intensity of storm surge and wave run-up. This statement reflects numerous climate change studies and reports which recognize that forecasted effects of climate change on sea level rise and storm intensity have the potential for increasing rates of coastal erosion from increased storm surge and wave run-up (*UNCHFCCC Report 2015; California OPC 2012; Coastal Commission Sea Level Rise Guidelines 2015; City of Santa Barbara General Plan Program EIR 2011, Climate Action Plan 2012,*

General Plan Safety Element 2013, Griggs-Russell City of Santa Barbara Sea Level Rise Vulnerability Study 2012). No MND text change is warranted for this existing conditions discussion.

The further MND analysis based on project technical studies identifies that with expected future erosion rates assuming the high range of projected sea level rise, and with the project location at sufficient distance 169 feet upslope from the lower cliff, the project would not be affected by accelerated erosion of the lower cliff, and the project would meet safety criteria for the project and would not exacerbate shoreline erosion, such that no shoreline protection devices would be required for the life of the project.

Lower bluff step and policy conflicts. Please see item 13 response. The references to the lower cliff or lower bluff are consistent with the City and Coastal Commission staff identification of the bluff on the site having a step-like feature with several tiers including the lower at 51 foot elevation and the upper at 127 foot elevation. The identification of the bluff edge at the 127 foot elevation by the Coastal Commission staff geologist and City staff is based on substantial evidence as described. A final determination of bluff edge location in connection with coastal policy consistency findings will be made by decision makers for the project permit application. The State CEQA Guidelines §15063 specifies that an Initial Study include an evaluation of project consistency with applicable plans and land use controls. Because there are differing opinions about the location of the bluff edge, the MND included evaluation of policy consistency or conflict for each of the bluff edge locations, including the 51 foot elevation.

Long-term erosion/ bluff setbacks and factors of safety. The text is referencing that the project technical report analyses, including the CSA supplemental response, did not entirely follow the current recommended Coastal Commission guidelines methodology for determining development setbacks (*M. Johnsson 2003*), which factors in a development setback from an area that already meets factor of safety criteria. However, the MND also includes the conclusions of the project technical reports that, with the development distance from the lower bluff step and the project design components for stabilizing the development envelope to a level meeting factor of safety criteria, the project during its life would not be affected by shoreline erosion, would not exacerbate shoreline erosion, and would not require shoreline protective devices.

- 32. Hazards/Fire Hazard.** *Correct reference to adjacent open space with native vegetation. (N. Dall, 03-10-16 technical comments attachment)*

Response: *Urban/Vegetation Interface.* The referenced discussion describes existing conditions with respect to fire hazard. Factors affecting fire hazard include steep slopes and interfaces between urban development and vegetated open spaces. It is a fact that a vegetated open space is located adjacent and downslope of the project development envelope. The term native vegetation refers to plant species indigenous to the area. No text change is required.

- 33. Recreation/Facilities.** *Correct reference to proposed open space easement. (N. Dall, 03-10-16 technical comments attachment)*

Response: *Open space easement.* The text of the proposed FMND has been edited to clarify the location of the proposed open space easement.

- 34. Water Quality and Hydrology.** *Correct references to owner of adjacent parcel; wave erosion effects on slope stability; development location. (N. Dall, 03-10-16 technical comments attachment)*

Response:

Owner of adjacent parcel. The text of the proposed FMND has been edited to correct the reference to the owner of record of the adjacent property at 1921 El Camino de la Luz.

Wave erosion effects. The MND discussion of existing baseline conditions is provided to identify potential hazards and constraints on the site. The discussion notes that that wave erosion at the toe of a slope has the potential to affect the stability of a landslide area above. This represents a well-known geologic process, and past geologic studies of the Mesa and past experience of slumps and landslides in the vicinity have documented the potential for wave run-up at the toe of a landslide to create the potential for undermining and activating a landslide. The MND analysis goes on to identify the effects of the project compared to this baseline condition. No text change is required in response to this comment.

Topography and project location. The proposed FMND text reference has been edited to clarify the location of the proposed development with respect to the sloping topography of the site.

- 35. Land Use and Planning. Revise language pertaining to potential policy conflicts. (N. Dall, 03-10-16 technical comments attachment)**

Response: *Bluff location and policy application.* Please see item 13 response regarding discussion of policy consistency analysis as part of the MND document.

- 36. Mandatory Findings of Significance. Concur with findings; include additional finding. (N. Dall, 03-10-16 technical comments attachment)**

Response: *Additional finding.* The suggested additional finding has been added to the proposed FMND, along with addition discussion summarizing impact analysis of the document that supports the mandatory findings.

Additional Questions and Comments

37. Relation of policy consistency and impact assessment

Comments requested further clarification of the relation between the determination for location of bluff edge/policy consistency and the MND assessment of no significant geological impacts (Planning Commissioners 03-03-16)

Response: Determination of the bluff edge is a qualitative assessment based on site topography and coastal guidelines, and is a factor in applying coastal policies. In areas with complex and variable topography such as the project site, more than one interpretation of the bluff edge is possible.

If the bluff edge is determined at 51 foot elevation as proposed by project applicant, the project would not be located on the bluff face and would not be inconsistent with the LCP policy 8.2 that prohibits most development on the bluff face.

If the bluff edge is determined at the 127 foot elevation as identified by City and Coastal Commission staff, the project could be found as located on the bluff face, and inconsistent with LCP policy 8.2.

In addition, the project siting on a location that does not meet factor of safety criteria without stabilization mechanisms could be found inconsistent with guidelines to apply coastal policies for establishing a development setback from a coastal bluff edge and areas naturally meeting slope stability factor of safety criteria.

The CEQA Guidelines provide for environmental analysis to identify whether a potentially significant impact could occur if a project could conflict with a policy adopted for the purpose of avoiding

significant impacts. Case law for interpreting and applying this CEQA Guidelines provision directs that a policy conflict is only identified as a significant impact under CEQA if the conflict would result in a significant physical effect.

The MND analysis recognizes the project site and area as subject to geological hazards pertaining to slope instability and erosion, and also recognizes that slope repair and revegetation work done following the 1978 landslide improved the stability and reduced overland erosion on the site. The extensive project technical analysis demonstrates that the project as proposed with slope stabilization and drainage and erosion controls would improve slope stability to meet industry factor of safety criteria, would improve the stability of the surrounding area, would improve control of drainage and overland erosion, would not require shoreline protective devices for the life of the project, and would not exacerbate geologic stability and erosion hazards or result in significant short-term or long-term impacts associated with safety, geologic hazards, and coastal resources.

Whether the bluff edge is determined at the 51 foot or 127 foot elevation, the project as proposed would not result in significant physical geologic impacts. Although proposed at a location where factor of safety criteria for slope stability do not currently exist, the project as proposed with slope stability devices would meet minimum factor of safety criteria for stability and would not result in significant physical geologic impacts. As such, any potential policy conflict with LCP Policy 8.2 and/or other coastal policies or guidelines for development setbacks from bluff edge and stable areas do not constitute a significant impact under CEQA.

However, project permit approval requires findings of project consistency with coastal policies. Therefore, potential policy inconsistencies remain a factor for the decision-maker decision on approving or denying the project permit request.

38. Takings.

Comment asks the instances of policy inconsistency determinations with subsequent findings of property takings (Planning Commissioner 03-03-16).

Response: The comment is not a comment on the draft MND environmental analysis. The Coastal Act (§30010) establishes a policy that local governments and the Coastal Commission shall not grant or deny permits in a manner resulting in a property taking. In such an instance, a permit may be granted for a project with policy consistency to the extent feasible and without full consistency with all coastal policies and guidelines. The Coastal Act taking policy has been occasionally invoked by the Coastal Commission and local agencies across the State to approve projects.

39. Liability.

Comment asks whether there are cases in which a permit is approved, the safety measures subsequently fails, and the owner sues the City (Planning Commissioner, 03-03-16)

Response: The comment is not addressing the MND analysis. It is standard City practice to apply a condition to permit approval that waives liability to the City. In addition, under the Government Code, the City has tort claims immunity for granting permits.

Additional Correspondence Received Responding to MND Comments

The following communications from the project applicant with responses to MND public review comments were received after the end of the public review period for the Draft MND.

Applicant Responses to Planning Commission Comments at 03-03-16 Hearing (N. Dall, 03-10-16)

Applicant Responses to Coastal Commission Letter (N. Dall, 03-30-16).

Applicant Responses to Public Comment by M. Lyons, D. Crawford, B. Peterson, M. & J. Maybell, J. and K. Finegold, J. Taylor, N. Brock & T. Morrison, M. Thomas, J. Morgan & S. Krome, S. & L. Wiscomb, R. Stenson (N. Dall 03-31-16)

Applicant Responses to Public Comment by J. Taylor, D. & M. Smith, R. Stenson, J. Dorn (N. Dall 04-06-16)

Applicant Responses to Public Comment by G. & J. Smith (N. Dall 04-07-16)

Coastal Commission staff email (05-02-16)